

New York State Electric & Gas
And
Rochester Gas and Electric

2020-2021 Winter Supply Plan

Case 20-M-0189

July 15, 2020



NYSEG



RG&E

Contents

NYSEG/RG&E 2020-2021 Winter Supply Update Plan	2
Data Request 1 – System Design Day Capacity – Table 1	3
Data Request 2 – Estimated Design Requirements – Table 2	12
Data Request 3 – COVID-19 Effects on Demand	21
Data Request 4 – Estimated Normal Requirements – Table 3	21
Data Request 5 – Heating Degree Day Source / Uses	30
Data Request 6 – Load Forecasting Tools	32
Data Request 7 – Forecast / Planning Horizon	33
Data Request 8 – Load Duration Curves	33
Data Request 9 – Historical Peak Day Takes vs. Contractual Entitlements	41
Data Request 10 – Hourly Forecasting Data	44
Data Request 11 – Exceeding Design Day Forecast and Capacity Planning	44
Data Request 12 – Effects on Flow due to Pipeline Limitations	49
Data Request 13 – Storage Curves	49
Data Request 14 – Storage Injection Plan	51
Data Request 15 – Least Cost Dispatch	51
Data Request 16 – Must Turn Requirements	52
Data Request 17 – Send Out Schedule Forecasting Requirements	53
Data Request 18 – Gas Supply Portfolio – Tables 4-6	54
Data Request 19 – Gas System Flow Diagram	64
Data Request 20 – Asset Projects	67
Data Request 21 – Peak Shaving	67
Data Request 22 – OFOs and Curtailments	67
Data Request 23 – Planning for Interruptible Service Classes	68
Data Request 24 – Long / Short Term Forecasting Process	68
Data Request 25 – Management Audit	69
Data Request 26 – Asset Management / Optimization Agreements	70
Data Request 27 – Off System Sales / Capacity Release	71
Data Request 28 – Mandatory Capacity Release / Grandfathered Capacity	72
Data Request 29 – Alternate Fuel	80
Data Request 30 – Communication Methods	82
Data Request 31 – Demand Response Planning	83
Data Request 32 – Interruptible Customers	83
Data Request 33 – Organization Chart	85
Data Request 34 – Natural Gas Conversions	87
Data Request 35 – CNG or LNG below Flood Level	92
Data Request 36 – Gas Purchasing Strategy	92
Data Request 37 – Gas Price Risk – Table 7	95
Data Request 38 – Local Production / Landfill	100
Data Request 39 – Renewable Natural Gas (RNG)	101
Data Request 40 – Convergence of the Gas and Electric Markets	101
Data Request 41 – Other Projects	103
Data Request 42 – Natural Gas Vehicles	104
Data Request 43 – CNG / LNG	104
Data Request 44 – Pipeline Projects	105
Data Request 45 – Billing Comparisons -Table 8	105
Attachment 1: NYSEG & RG&E OFOs, System Alerts and Curtailments	1



Attachment 2: NYSEG Interruptible Letter and Alternate Fuel Compliance Form 2019-2020	1
Attachment 3: RG&E Heating Season Letters and Alternate Fuel Compliance Forms 2019- 2020	1
Attachment 4: NYSEG Replenishment of Oil Storage Inventories	1
Attachment 5: Non-Interruptible Customers with Alternate Fuel Capabilities	1
Attachment 6: NYSEG Franchise Opportunities.....	1
Attachment 7: Electric Generators in NYSEG and RG&E Service Territory	1

NYSEG/RG&E 2020-2021 Winter Supply Update Plan

Overview

The enclosed 2020-2021 Winter Supply Update Plan for New York State Electric & Gas (NYSEG) and Rochester Gas and Electric (RG&E) (collectively the Companies), was prepared and submitted for filing as requested by Mr. Chris Stolicky's letter dated May 8, 2020.

The 2020-2021 Winter Supply Update Plan submittal is designed as a series of responses to the list of questions submitted by DPS Staff. As you view the electronic version, for ease of navigation within the document, you may use the links in the Table of Contents (TOC) or the bookmarks that have been provided. To move to a specific data request, select the specific data request topic from the TOC or the bookmark list, (i.e. *Data Request 1*)

Please note that certain responses will be submitted requesting Trade Secret protection pursuant to the Commission's Codes, Rules and Regulations, 16 NYCRR Section 6-1.3 and Public Officers Law ("POL") Section 87.2 (c) and (d).

Please do not hesitate to contact Marcella Hightower at 585.484.6545 if further information is required.



Issues 1 and 2 (Data Requests 1 – 16)

Please provide the following information related to your company's portfolio and purchasing strategy for the upcoming 2020-2021 send out year and anticipated portfolio changes over the next five years:

Data Request 1 – System Design Day Capacity – Table 1

System design day capacity capability by service area (or gate when indicated) and peak design day demand by service area (or gate when indicated). Please include all capacity volumes, including all recallable capacity assets that are available or needed for peak design day and specify the volumes supporting sales, transportation customers and retail access capacity release. Include last year's 2019-2020 Table 1 (final update) data for purposes of comparison. The total capacity capability must meet or exceed the design peak day demand value provided. Identify any projected capacity assets that are not yet finalized but will be prior to the upcoming winter heating season, including both a description and projected completion date.

Response

Table 1 is a summary of all capacity volumes that support sales and transportation customers for the 2019-2020 Winter and 2020-2021 Winter for NYSEG Total, NYSEG DTI, NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen and RG&E.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 15, 2020
Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
TOTAL			
Flowing Supplies	221,257	224,084	
Storage Withdrawals	205,560	205,560	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	1,050	1,050	
Cogen Supplies	0	0	
Local Production ⁽²⁾	614	115	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾ :			
Mandatory Retail Access Capacity	60,190	60,190	
Grandfathered Retail Access Capacity	6,596	6,596	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁴⁾	61,822	64,049	
Peak Day Totals	557,089	561,644	513,693
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system. Local production is not firm supply.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
 Service Area: DTI
 Submission Date: July 15, 2020
 Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
DTI			
Flowing Supplies	90,778	93,005	
Storage Withdrawals	127,302	127,302	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	1,050	1,050	
Cogen Supplies	0	0	
Local Production ⁽²⁾	614	115	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾:			
Mandatory Retail Access Capacity	52,218	52,218	
Grandfathered Retail Access Capacity	3,520	3,520	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁴⁾	24,725	24,797	
Peak Day Totals	300,207	302,007	275,433
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system. Local production is not firm supply.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
 Service Area: TCO
 Submission Date: July 15, 2020
 Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
TCO			
Flowing Supplies	61,794	61,794	
Storage Withdrawals	68,514	68,514	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production ⁽²⁾	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾ :			
Mandatory Retail Access Capacity	4,693	4,693	
Grandfathered Retail Access Capacity	83	83	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁴⁾	21,255	21,255	
		0	
Peak Day Totals	156,339	156,339	142,955
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
 Service Area: Lockport (TGP)
 Submission Date: July 15, 2020
 Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
LOCKPORT (TGP)			
Flowing Supplies	39,306	39,906	
Storage Withdrawals	9,744	9,744	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production ⁽²⁾	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾ :			
Mandatory Retail Access Capacity	3,279	3,279	
Grandfathered Retail Access Capacity	2,803	2,803	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁴⁾	12,540	12,540	
Peak Day Totals	67,672	68,272	63,595
	Peak Day Design Temp:		-9

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
 Service Area: North Country
 Submission Date: July 15, 2020
 Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
NORTH COUNTRY			
Flowing Supplies	12,600	12,600	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production ⁽²⁾	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾ :			
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁴⁾	2,512	5,058	
Peak Day Totals	15,112	17,658	16,919
	Peak Day Design Temp:		-20

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Brewster
Submission Date: July 15, 2020
Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
BREWSTER			
Flowing Supplies (AGT also serves Goshen)⁽⁵⁾	16,779	7,329	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production ⁽²⁾	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾:			
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	190	190	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity⁽⁴⁾	399	399	
Peak Day Totals	17,368	7,918	5,224
	Peak Day Design Temp:		-6

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.

(5) 2020-2021 Flowing Supply reflects portion of AGT contract volume allocated to serve Brewster.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: NYSEG
Service Area: Goshen
Submission Date: July 15, 2020
Version #: 1

New York State Electric & Gas	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
GOSHEN			
Flowing Supplies (AGT also serves Brewster) ⁽⁵⁾	16,779	9,450	
Storage Withdrawals	0	0	
Winter Peaking Service *	0	0	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production ⁽²⁾	0	0	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽³⁾ :			
Mandatory Retail Access Capacity	0	0	
Grandfathered Retail Access Capacity	0	0	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁴⁾	391	0	
Peak Day Totals	17,170	9,450	9,567
	Peak Day Design Temp:		-6

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

(3) Marketer Provided Supplies for 2020-21 will be updated August 2020.

(4) Includes Daily Metered Alternate Fuel, Interruptible Transport and Secondary Daily Metered customers.

(5) 2020-2021 Flowing Supply reflects portion of AGT contract volume allocated to serve Goshen.



Table 1: Total System Firm Peak Day Capacity (DT)

Company: RG&E
 Service Area: RG&E TOTAL
 Submission Date: July 15, 2020
 Version #: 1

Rochester Gas & Electric	2019-20 Winter	2020-21 Winter	Design Peak Day Demand ⁽¹⁾
RG&E TOTAL			
Flowing Supplies	226,100	226,100	
Storage Withdrawals	179,000	179,000	
Winter Peaking Service * ⁽²⁾	25,000	25,000	
Renewable Gas**	0	0	
LNG	0	0	
CNG	0	0	
Cogen Supplies	0	0	
Local Production ⁽³⁾	64	64	
Recallable Capacity (AMAs, etc.)	0	0	
Marketer Provided Supplies ⁽⁴⁾:			
Mandatory Retail Access Capacity	69,789	69,789	
Grandfathered Retail Access Capacity	14,873	14,873	
Non- Mandatory Firm Capacity	0	0	
Other Customer Capacity ⁽⁵⁾	35,445	35,445	
Peak Day Totals	550,271	550,271	533,631
	Peak Day Design Temp:		-10

* City Gate Delivered by Others and In-Territory Supplies (not LNG or CNG)

** Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system.

Table Notes:

(1) From Table 2 data.

(2) Anticipated firm citygate supply for winter of 2020-2021.

(3) Local Production, landfill gas, renewables, etc. delivered directly into the LDC distribution system. Local production is not firm supply.

(4) Marketer Provided Supplies for 2019-20 updated August 2020.

(5) Includes Daily Metered Alternate Fuel, Interruptible and Secondary Daily Metered customers.



Data Request 2 – Estimated Design Requirements – Table 2

Estimated annual, winter season, and daily requirements by service area (or gate when indicated) for last year and the next five years, using design weather. Include a description of the design weather criteria and explain any changes from the previous year. The 2019-2020 actual data experienced last year is to be included for purposes of comparison. Also include any and all service areas (or gate stations when indicated) where moratoriums have been put into place or have the possibility of being instituted in the next five years. Identify where any curtailments to firm customers may occur.

Response

Estimated Requirements (Design Weather): Table 2 provides the actual, winter season, and daily requirements for last year and the estimated next five (5) years, using design weather for NYSEG Total, NYSEG DTI, NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen and RG&E. Design weather criterion is also provided for each of these areas. The Design Winter Heating Degree Day value is typically no less than 10% colder than Normal Winter Criteria. The methodology for determining the design weather criteria is further described in the response to [Data Request 5](#).

Although many areas across New York State experienced warmer than normal weather during the 2019-20 winter, storage injections have not been affected. Both companies met projected plan targets at the end of the withdrawal period. The 2019-2020 weather experienced last year did not impact NYSEG or RG&E's daily or winter season design parameters.

Currently, NYSEG's service territory has a formal moratorium in place only in the Town of Lansing, Tompkins County. RG&E has no formal moratoriums in place in any location. Pursuant to Case 20-G-0131, Proceeding on Motion of the Commission in Regard to Gas Planning Procedures ("March 2020 Order"), issued and effective March 19, 2020, by the New York Public Service Commission ("Commission"), NYSEG and RG&E have identified locations within their service territories vulnerable to supply constraints. These vulnerable locations can be caused by a shortage of pipeline capacity serving the area, distribution infrastructure issues, or a combination of these and other factors. These areas do not have formal moratoriums; however, the companies continue to refine their modeling efforts, monitor developments associated with identified vulnerabilities, such as Goshen and Avon, and actively pursue on-going issue resolution. Please refer to [Data Request 34](#) for details.

No firm customers were curtailed in the 2019-2020 heating season. NYSEG and RG&E do not anticipate any issues that would prevent them from serving firm load in the upcoming heating season with the exception of a force majeure event.



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	28,575	26,347	29,121	29,168	29,124	29,096	29,143
Transportation	30,175	25,833	28,835	29,033	29,163	29,232	29,213
Non-Firm							
Sales	390	324	390	390	390	390	390
Transportation	2,328	1,997	2,328	2,328	2,328	2,328	2,328
Total	61,468	54,500	60,675	60,920	61,006	61,047	61,075
Winter Season							
Firm							
Sales	21,841	19,216	21,926	22,128	22,154	22,161	22,158
Transportation	17,190	14,908	16,610	16,607	16,644	16,667	16,688
Non-Firm							
Sales	242	210	242	242	242	242	242
Transportation	1,197	1,065	1,198	1,198	1,198	1,198	1,198
Total	40,470	35,400	39,976	40,175	40,237	40,267	40,286
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	301,329	222,881	303,010	305,031	304,626	304,372	304,801
Transportation	206,879	152,640	210,683	212,479	213,665	214,290	214,121
Total	508,208	375,521	513,693	517,510	518,291	518,662	518,922

Design Weather is defined as ⁽³⁾:

Annual 7,704 HDD
Winter 6,571 HDD
Peak Day 75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Binghamton (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG DTI
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	16,002	14,754	16,308	16,334	16,309	16,294	16,320
Transportation	16,898	14,466	16,148	16,258	16,331	16,370	16,360
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	372	320	373	373	373	373	373
Total	33,272	29,540	32,828	32,965	33,013	33,036	33,052
Winter Season							
Firm							
Sales	12,232	10,761	12,279	12,392	12,406	12,410	12,409
Transportation	9,627	8,348	9,302	9,300	9,321	9,334	9,346
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	227	202	228	228	228	228	228
Total	22,086	19,312	21,808	21,919	21,954	21,971	21,982
NYSEG Peak Day - dth ⁽¹⁾							
Firm							
Sales	152,053	116,817	153,665	153,908	153,681	153,539	153,779
Transportation	120,228	88,910	121,768	122,774	123,438	123,788	123,693
Total	272,281	205,727	275,433	276,682	277,119	277,327	277,472

Design Weather is defined as ⁽³⁾:

Annual 7,704 HDD
Winter 6,571 HDD
Peak Day 75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Binghamton (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG TCO
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	6,858	6,323	6,989	7,000	6,990	6,983	6,994
Transportation	7,242	6,200	6,920	6,968	6,999	7,016	7,011
Non-Firm							
Sales	70	58	70	70	70	70	70
Transportation	931	799	931	931	931	931	931
Total	15,101	13,380	14,911	14,970	14,990	15,000	15,007
Winter Season							
Firm							
Sales	5,242	4,612	5,262	5,311	5,317	5,319	5,318
Transportation	4,125	3,578	3,986	3,986	3,995	4,000	4,005
Non-Firm							
Sales	44	38	44	44	44	44	44
Transportation	395	352	395	395	395	395	395
Total	9,806	8,579	9,687	9,735	9,750	9,757	9,762
Peak Day - dth ⁽¹⁾							
Firm							
Sales	92,752	65,192	93,723	93,827	93,730	93,669	93,772
Transportation	49,682	35,780	49,232	49,663	49,948	50,098	50,057
Total	142,434	100,972	142,955	143,490	143,678	143,767	143,829

Design Weather is defined as ⁽³⁾:

Annual	7,704 HDD
Winter	6,571 HDD
Peak Day	75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Binghamton (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
 Service Area: NYSEG LOCKPORT (TGP)
 Submission Date: July 15, 2020
 Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	3,715	3,425	3,786	3,792	3,786	3,782	3,789
Transportation	3,923	3,358	3,749	3,774	3,791	3,800	3,798
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	489	419	489	489	489	489	489
Total	8,126	7,203	8,023	8,055	8,066	8,072	8,075
Winter Season							
Firm							
Sales	2,839	2,498	2,850	2,877	2,880	2,881	2,881
Transportation	2,235	1,938	2,159	2,159	2,164	2,167	2,169
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	287	256	287	287	287	287	287
Total	5,361	4,692	5,297	5,323	5,331	5,335	5,338
Peak Day - dth ⁽¹⁾							
Firm							
Sales	36,197	26,794	36,613	36,669	36,616	36,583	36,639
Transportation	27,642	19,433	26,982	27,215	27,369	27,450	27,428
Total	63,839	46,227	63,595	63,884	63,985	64,033	64,067

Design Weather is defined as ⁽³⁾:

Annual	7,057 HDD
Winter	6,143 HDD
Peak Day	74 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Buffalo (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
 Service Area: NYSEG NORTH COUNTRY
 Submission Date: July 15, 2020
 Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	1,143	1,054	1,165	1,167	1,165	1,164	1,166
Transportation	1,207	1,033	1,153	1,161	1,167	1,169	1,169
Non-Firm							
Sales	297	246	297	297	297	297	297
Transportation	512	439	512	512	512	512	512
Total	3,159	2,772	3,127	3,137	3,140	3,142	3,143
Winter Season							
Firm							
Sales	874	769	877	885	886	886	886
Transportation	688	596	664	664	666	667	668
Non-Firm							
Sales	181	158	181	181	181	181	181
Transportation	287	256	287	287	287	287	287
Total	2,030	1,778	2,010	2,018	2,021	2,022	2,023
Peak Day - dth ⁽¹⁾							
Firm							
Sales	8,220	5,630	7,475	7,492	7,476	7,466	7,483
Transportation	6,272	6,524	9,444	9,516	9,563	9,588	9,581
Total	14,492	12,154	16,919	17,008	17,039	17,054	17,064

Design Weather is defined as ⁽³⁾:

Annual	7,850 HDD
Winter	6,835 HDD
Peak Day	85 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Burlington (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG BREWSTER
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	286	263	291	292	291	291	291
Transportation	302	258	288	290	292	292	292
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	587	522	580	582	583	583	584
Winter Season							
Firm							
Sales	218	192	219	221	222	222	222
Transportation	172	149	166	166	166	167	167
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	390	341	385	387	388	388	388
Peak Day - dth ⁽¹⁾							
Firm							
Sales	3,814	2,577	3,782	3,786	3,782	3,779	3,783
Transportation	1,438	1,046	1,442	1,460	1,472	1,478	1,476
Total	5,252	3,623	5,224	5,246	5,254	5,257	5,259

Design Weather is defined as ⁽³⁾:

Annual	6,656 HDD
Winter	5,873 HDD
Peak Day	71 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: NYSEG
Service Area: NYSEG GOSHEN
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	571	527	582	583	582	582	583
Transportation	604	517	577	581	583	585	584
Non-Firm							
Sales	23	19	23	23	23	23	23
Transportation	23	20	23	23	23	23	23
Total	1,222	1,083	1,206	1,211	1,212	1,213	1,214
Winter Season							
Firm							
Sales	437	384	439	443	443	443	443
Transportation	344	298	332	332	333	333	334
Non-Firm							
Sales	17	15	17	17	17	17	17
Transportation	0	0	0	0	0	0	0
Total	798	697	788	792	793	793	794
Peak Day - dth ⁽¹⁾							
Firm							
Sales	8,293	5,871	7,752	9,348	9,340	9,335	9,344
Transportation	1,617	947	1,815	1,851	1,875	1,888	1,885
Total	9,910	6,818	9,567	11,199	11,215	11,223	11,229

Design Weather is defined as ⁽³⁾:

Annual	6,656 HDD
Winter	5,873 HDD
Peak Day	71 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average



Table 2: Estimated Requirements (MDT) – Design Weather

Company: RG&E
Service Area: RG&E
Submission Date: July 15, 2020
Version #: 1

RGE	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	30,607	28,728	31,057	31,135	31,560	31,749	31,873
Transportation	33,469	28,720	32,500	32,270	32,388	32,507	32,542
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	64,076	57,449	63,557	63,405	63,948	64,256	64,416
Winter Season							
Firm							
Sales	23,067	20,805	23,482	23,466	23,753	23,912	23,990
Transportation	19,446	16,004	18,833	18,670	18,722	18,780	18,794
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	42,513	36,809	42,315	42,135	42,475	42,692	42,784
Peak Day - Dth⁽¹⁾							
Firm							
Sales	314,777	245,138	336,610	337,312	341,181	342,898	344,028
Transportation	221,836	154,064	197,021	194,934	196,002	197,089	197,409
Total	536,613	399,202	533,631	532,246	537,183	539,987	541,437

⁽³⁾ Design Weather is defined as:

Annual	7,037 HDD
Winter	6,111 HDD
Peak Day	75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ RG&E Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Rochester (RG&E) weather point; 30 year average



Data Request 3 – COVID-19 Effects on Demand

Given the impacts of COVID-19 on the economy, including both New York Pause and the recession that is likely to follow, how much will natural gas demand decrease in the near term and on an annual basis for the next ten years, and how long does it delay the need to add incremental supply?

Response

The forecasted impacts of COVID-19 are captured in the demographic and economic variable forecasts from the May 2020 Moody's Analytics. Results indicate a slight decline in natural gas deliveries for the later part of 2020 through 2021, with flat to minimal growth for the remaining years of the forecast.

Data Request 4 – Estimated Normal Requirements – Table 3

Same information as requested in (2) but using normal weather. Include a description of the normal weather criteria and the calculation methodology. The 2019-2020 data submitted last year is to be included for purposes of comparison. Please Note: if Table 3 is based on a sales forecast using anything less than 30 years of weather data, no part of Table 3 may be used to develop any part of Table 2.

Response

Estimated Requirements (Normal Weather) Table 3 provides the estimated annual, winter season, and daily requirements for last year and the next five (5) years, using 30-year normal weather for NYSEG Total, NYSEG DTI, NYSEG TCO, NYSEG Lockport (TGP), NYSEG North Country, NYSEG Brewster, NYSEG Goshen and RG&E. The normal weather criterion by area is also included. The normal five (5) year forecasts denote a fairly flat projection to total sales over the reporting period.

Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG TOTAL
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	25,977	26,347	26,473	26,517	26,476	26,451	26,494
Transportation	27,432	25,833	26,214	26,393	26,512	26,575	26,558
Non-Firm							
Sales	355	324	355	355	355	355	355
Transportation	2,116	1,997	2,117	2,117	2,117	2,117	2,117
Total	55,880	54,500	55,159	55,382	55,460	55,497	55,523
Winter Season							
Firm							
Sales	19,856	19,216	19,933	20,117	20,140	20,146	20,144
Transportation	15,627	14,908	15,100	15,098	15,131	15,152	15,171
Non-Firm							
Sales	220	210	220	220	220	220	220
Transportation	1,088	1,065	1,089	1,089	1,089	1,089	1,089
Total	36,791	35,400	36,342	36,523	36,579	36,607	36,624
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	301,329	222,881	303,010	305,031	304,626	304,372	304,801
Transportation	206,879	152,640	210,683	212,479	213,665	214,290	214,121
Total	508,208	375,521	513,693	517,510	518,291	518,662	518,922

Normal Weather is defined as ⁽³⁾:

Annual	7,003 HDD
Winter	5,973 HDD
Peak Day	75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Binghamton (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG DTI
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	14,547	14,754	14,825	14,849	14,827	14,812	14,837
Transportation	15,362	14,466	14,680	14,780	14,847	14,882	14,872
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	339	320	339	339	339	339	339
Total	30,248	29,540	29,843	29,968	30,012	30,033	30,047
Winter Season							
Firm							
Sales	11,119	10,761	11,162	11,265	11,278	11,282	11,281
Transportation	8,751	8,348	8,456	8,455	8,473	8,485	8,496
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	207	202	207	207	207	207	207
Total	20,077	19,312	19,825	19,927	19,958	19,974	19,983
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	152,053	116,817	153,665	153,908	153,681	153,539	153,779
Transportation	120,228	88,910	121,768	122,774	123,438	123,788	123,693
Total	272,281	205,727	275,433	276,682	277,119	277,327	277,472

Normal Weather is defined as ⁽³⁾:

Annual	7,003 HDD
Winter	5,973 HDD
Peak Day	75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Binghamton (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG TCO
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	6,234	6,323	6,354	6,364	6,354	6,348	6,359
Transportation	6,584	6,200	6,291	6,334	6,363	6,378	6,374
Non-Firm							
Sales	64	58	64	64	64	64	64
Transportation	847	799	847	847	847	847	847
Total	13,729	13,380	13,555	13,609	13,628	13,637	13,643
Winter Season							
Firm							
Sales	4,765	4,612	4,784	4,828	4,834	4,835	4,835
Transportation	3,750	3,578	3,624	3,623	3,631	3,636	3,641
Non-Firm							
Sales	40	38	40	40	40	40	40
Transportation	359	352	359	359	359	359	359
Total	8,915	8,579	8,807	8,850	8,864	8,870	8,875
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	92,752	65,192	93,723	93,827	93,730	93,669	93,772
Transportation	49,682	35,780	49,232	49,663	49,948	50,098	50,057
Total	142,434	100,972	142,955	143,490	143,678	143,767	143,829

Normal Weather is defined as⁽³⁾:

Annual	7,003 HDD
Winter	5,973 HDD
Peak Day	75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Binghamton (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG LOCKPORT (TGP)
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	3,377	3,425	3,442	3,447	3,442	3,439	3,444
Transportation	3,566	3,358	3,408	3,431	3,447	3,455	3,452
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	444	419	444	444	444	444	444
Total	7,388	7,203	7,294	7,323	7,333	7,338	7,341
Winter Season							
Firm							
Sales	2,581	2,498	2,591	2,615	2,618	2,619	2,619
Transportation	2,031	1,938	1,963	1,963	1,967	1,970	1,972
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	261	256	261	261	261	261	261
Total	4,874	4,692	4,816	4,839	4,846	4,850	4,852
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	36,197	26,794	36,613	36,669	36,616	36,583	36,639
Transportation	27,642	19,433	26,982	27,215	27,369	27,450	27,428
Total	63,839	46,227	63,595	63,884	63,985	64,033	64,067

Normal Weather is defined as ⁽³⁾:

Annual	6,414 HDD
Winter	5,584 HDD
Peak Day	74 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Buffalo (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
 Service Area: NYSEG NORTH COUNTRY
 Submission Date: July 15, 2020
 Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	1,039	1,054	1,059	1,061	1,059	1,058	1,060
Transportation	1,097	1,033	1,049	1,056	1,060	1,063	1,062
Non-Firm							
Sales	270	246	270	270	270	270	270
Transportation	466	439	466	466	466	466	466
Total	2,872	2,772	2,843	2,852	2,855	2,856	2,857
Winter Season							
Firm							
Sales	794	769	797	805	806	806	806
Transportation	625	596	604	604	605	606	607
Non-Firm							
Sales	165	158	165	165	165	165	165
Transportation	261	256	261	261	261	261	261
Total	1,845	1,778	1,828	1,835	1,837	1,838	1,839
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	8,220	5,630	7,475	7,492	7,476	7,466	7,483
Transportation	6,272	6,524	9,444	9,516	9,563	9,588	9,581
Total	14,492	12,154	16,919	17,008	17,039	17,054	17,064

Normal Weather is defined as⁽³⁾:

Annual	7,137 HDD
Winter	6,214 HDD
Peak Day	85 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Burlington (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG BREWSTER
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	260	263	265	265	265	265	265
Transportation	274	258	262	264	265	266	266
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	534	522	527	529	530	530	531
Winter Season							
Firm							
Sales	199	192	199	201	201	201	201
Transportation	156	149	151	151	151	152	152
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	355	341	350	352	353	353	353
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	3,814	2,577	3,782	3,786	3,782	3,779	3,783
Transportation	1,438	1,046	1,442	1,460	1,472	1,478	1,476
Total	5,252	3,623	5,224	5,246	5,254	5,257	5,259

Normal Weather is defined as⁽³⁾:

Annual	6,051 HDD
Winter	5,339 HDD
Peak Day	71 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: NYSEG
Service Area: NYSEG GOSHEN
Submission Date: July 15, 2020
Version #: 1

NYSEG	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	520	527	529	530	530	529	530
Transportation	549	517	524	528	530	531	531
Non-Firm							
Sales	21	19	21	21	21	21	21
Transportation	21	20	21	21	21	21	21
Total	1,111	1,083	1,096	1,101	1,102	1,103	1,103
Winter Season							
Firm							
Sales	397	384	399	402	403	403	403
Transportation	313	298	302	302	303	303	303
Non-Firm							
Sales	15	15	15	15	15	15	15
Transportation	0	0	0	0	0	0	0
Total	725	697	716	720	721	721	722
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	8,293	5,871	7,752	9,348	9,340	9,335	9,344
Transportation	1,617	947	1,815	1,851	1,875	1,888	1,885
Total	9,910	6,818	9,567	11,199	11,215	11,223	11,229

Normal Weather is defined as⁽³⁾:

Annual	6,051 HDD
Winter	5,339 HDD
Peak Day	71 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ NYSEG Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Poughkeepsie (NYSEG) weather point; 30 year average



Table 3: Estimated Requirements (MDT) – Normal Weather

Company: RG&E
 Service Area: RG&E
 Submission Date: July 15, 2020
 Version #: 1

RG&E	2019-20 Forecast	2019-20 Actual ⁽²⁾	2020-21	2021-22	2022-23	2023-24	2024-25
Annual							
Firm							
Sales	27,825	28,728	28,234	28,304	28,691	28,863	28,976
Transportation	30,426	28,720	29,545	29,336	29,443	29,552	29,584
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	58,251	57,449	57,779	57,641	58,134	58,415	58,560
Winter Season							
Firm							
Sales	20,970	20,805	21,347	21,332	21,594	21,738	21,809
Transportation	17,678	16,004	17,121	16,973	17,020	17,072	17,085
Non-Firm							
Sales	0	0	0	0	0	0	0
Transportation	0	0	0	0	0	0	0
Total	38,648	36,809	38,468	38,305	38,614	38,811	38,895
Peak Day - Dth ⁽¹⁾							
Firm							
Sales	314,777	245,138	336,610	337,312	341,181	342,898	344,028
Transportation	221,836	154,064	197,021	194,934	196,002	197,089	197,409
Total	536,613	399,202	533,631	532,246	537,183	539,987	541,437

⁽³⁾ Normal Weather is defined as:

Annual 6,396 HDD
 Winter 5,555 HDD
 Peak Day 75 HDD

⁽¹⁾ Forecasted Peak Day Demand is in Dths/day

⁽²⁾ RG&E Annual Actual throughput (June 2019 - May 2020)

⁽³⁾ Weather criterion for Rochester (RG&E) weather point; 30 year average



Data Request 5 – Heating Degree Day Source / Uses

Identify your source for heating degree day (HDD) data, including the specific weather data points used for forecast purposes. Describe your source and/or your calculation of design day and design winter data (i.e. calculated from normal usage or an actual historic period). Identify the time periods used to develop usage per HDD for both design and normal usage and explain the frequency of updates. If 30 years of data is not being used for design, please explain why. Please explain how usage per HDD for the peak period is calculated and verified.

Response

Heating Degree Data (“HDD”)

NYSEG provides gas service to customers that are geographically dispersed across upstate New York. RG&E, on the other hand, provides gas service to customers primarily in the metro-Rochester area. As such, weather patterns may be substantially different for each of these areas, thereby requiring the need for weather data from several locations.

NYSEG and RG&E receive its HDD data from a service arrangement with AWIS Weather Services, Inc. (“AWIS”). The arrangement provides hourly and daily weather data actuals and forecasts for the following locations:

- Albany County Airport (KALB)
- Binghamton/Broome County Regional Airport (KBGM)
- Buffalo International Airport (KBUF)
- Burlington International Airport (KBVT)
- Poughkeepsie (Dutchess County Airport) (KPOU)
- Rochester Airport (KROC)
- Elmira (KELM)
- Niagara Falls (KIAG)
- Penn Yan (KPEO)

NYSEG’s design weather pattern for planning utilizes weather data for seven (7) NYSEG load areas, while RG&E is a single load area. The companies also utilize GasDay, which is a vendor-supplied software application that delivers customized forecasting models trained on historical weather data. GasDay is used for near-term forecasting, up to seven (7) days in advance.

NYSEG uses the above locations as follows:

1. KBGM weather information for the market areas served by the Dominion Energy Transmission and Columbia Pipeline systems.
2. KBUF weather information for the Lockport area.
3. KBVT weather information is used for daily forecasts for the Plattsburgh and Lowville market areas.
4. KPOU weather information is used for the Brewster and Goshen market areas.

RG&E uses the KROC weather information for the Rochester market area.

For near term forecasting, GasDay is configured to utilize multiple weather stations that closely represent the geographic areas of our service territory. The following list illustrates the various weather stations for NYSEG and RG&E:



1. KALB (11.31%), KBGM (26.29%), KPEO (36.29%) and KELM (26.12%) weather information for the market areas served by the Dominion Pipeline system.
2. KALB (7.98%), KBGM (50.49%) and KELM (41.53%) weather information for the market areas served by the Columbia Pipeline system.
3. KROC (42.90%) and KIAG (57.10%) weather information for the Lockport area.
4. KBVT (100%) weather information is used for daily forecasts for the Plattsburgh market area.
5. KPOU (100%) weather information is used for the Brewster market area.
6. KALB (8.86%) and KPOU (91.14%) for the Goshen market area.
7. KALB (39.87%), KBVT (41.43%) and KPOU (18.71%) weather information is used for daily forecasts for the Lowville market area.
8. KROC (80.17%), KIAG (5.85%) and KPEO (13.98%) weather information for the Rochester market area.

The design day HDD's for most areas remain unchanged from last year. These are summarized as follows:

Design HDD	
Area	
Binghamton / Olean	75
Brewster	71
Goshen	71
Lockport	74
Lowville	85
Plattsburgh	85
Rochester	75

NYSEG and RG&E incorporated a dynamic analysis several years ago, utilizing the most recent 40-years of data, to develop updated design and normal usage degree day calculations. The analysis was updated to the most recent 40-years of data, and the weather analysis will be updated annually to capture the most recent data. From a planning perspective, there is no consensus within the natural gas industry as to the single best approach for a design day HDD standard. Gas Supply has discussed this subject with Marquette University as well; Marquette's recommendation, based on their research, is that design day HDDs should not be lowered based on the latest 40 years of data. Based on the various industry approaches and Marquette's recommendation, NYSEG and RG&E plan to continue to increase the design day HDD should a new peak HDD occur in the current 40-year weather data, however, the design day HDD is not anticipated to be lowered. The Design Winter utilizes the rule curve methodology to establish the highest set of HDDs over the previous 40-year period.

Usage per HDD Verification

The Companies conduct a variety of analyses in an effort to validate the design day demand levels for each operating area.

1. The design day analysis evaluation is based upon regression analyses performed on actual winter month usage and associated HDDs to determine base and heat factors and an associated design day estimate.
2. Extrapolation utilizing the heat factor from (1) above multiplied by (design day HDD minus the actual HDD) plus the actual metered load. Then the average, maximum and minimum extrapolated design loads are reviewed.



3. Utilization of total non-daily metered winter heat load divided by the total HDDs multiplied by design day HDD + baseload factor provides a third design day demand estimate.

Data Request 6 – Load Forecasting Tools

Describe the load forecasting tools used to develop the above forecasts. Indicate how all natural gas efficiency programs, Demand Response Programs, Microgrids, and Non-Pipe Alternatives (NPA) conducted by your company, contractors or the New York State Energy Research and Development Authority (NYSERDA) have been incorporated into these forecasts and your capacity planning. Provide a summary of the projected energy savings and the actual savings realized to date. How are these savings translated into the normal usage projection in [Table 3](#)? Also please indicate how your compliance with the New Efficiency New York (Case 18-M-0084) will affect the peak day load for each year in your five-year forecast.

Response

NYSEG and RG&E use a combination of tools to produce the gas load forecast. Econometric models (developed in MetrixND) are used to forecast the revenue class deliveries. Out of model adjustments are sometimes made based on market research and feedback from our Key Account Managers. Instances of these adjustments are rare, however, and would only occur for a significant change in deliveries not captured in the models such as an existing large customer that leaves the system or a new franchise being established. For this current forecast, an out of model adjustment was made to capture the impact of a customer's significant load increase to the Rochester distribution system.

Impacts of NYSEG and RG&E active energy Efficiency Transition Implementation Plans (ETIP) programs are imbedded in the historical data used in the modeling process. For this forecast, no out of model adjustments were made for future incremental ETIP targets. Should such adjustments be incorporated, forecasts would be reduced per the table below:

Year	Annual ETIP Target		Cumulative ETIP Target	
	NYSEG	RG&E	NYSEG	RG&E
2020	132,141	153,246		
2021	149,818	172,393	281,959	325,639
2022	167,658	192,920	449,617	518,559
2023	195,141	226,291	644,758	744,850
2024	225,234	254,106	869,992	998,956
2025	260,409	288,450	1,130,401	1,287,406

The actual achieved dth savings reported for 2019 for all gas efficiency programs is 55,881 Dth for NYSEG and 194,599 Dth for RG&E. There are currently no existing Demand Response Programs, Microgrids or NPA that impact Table 3 forecasts.



Data Request 7 – Forecast / Planning Horizon

What is your current forecast/planning horizon for supply and capacity purposes and explain why it is used? If you aren't using a minimum of five years for Gas Engineering, please explain.

Response

NYSEG and RG&E plans utilize a five (5)-year planning horizon because pipeline capacity commitments to cover design day requirements are typically for a minimum of five (5) years. It should be noted that there may be exceptions to this position, but for only a small component of the portfolio. The planning horizon for capacity requirements can be found in [Tables 2](#) and [3](#) and is based on the forecast methodology identified in the response to [Data Request 5](#).

Data Request 8 – Load Duration Curves

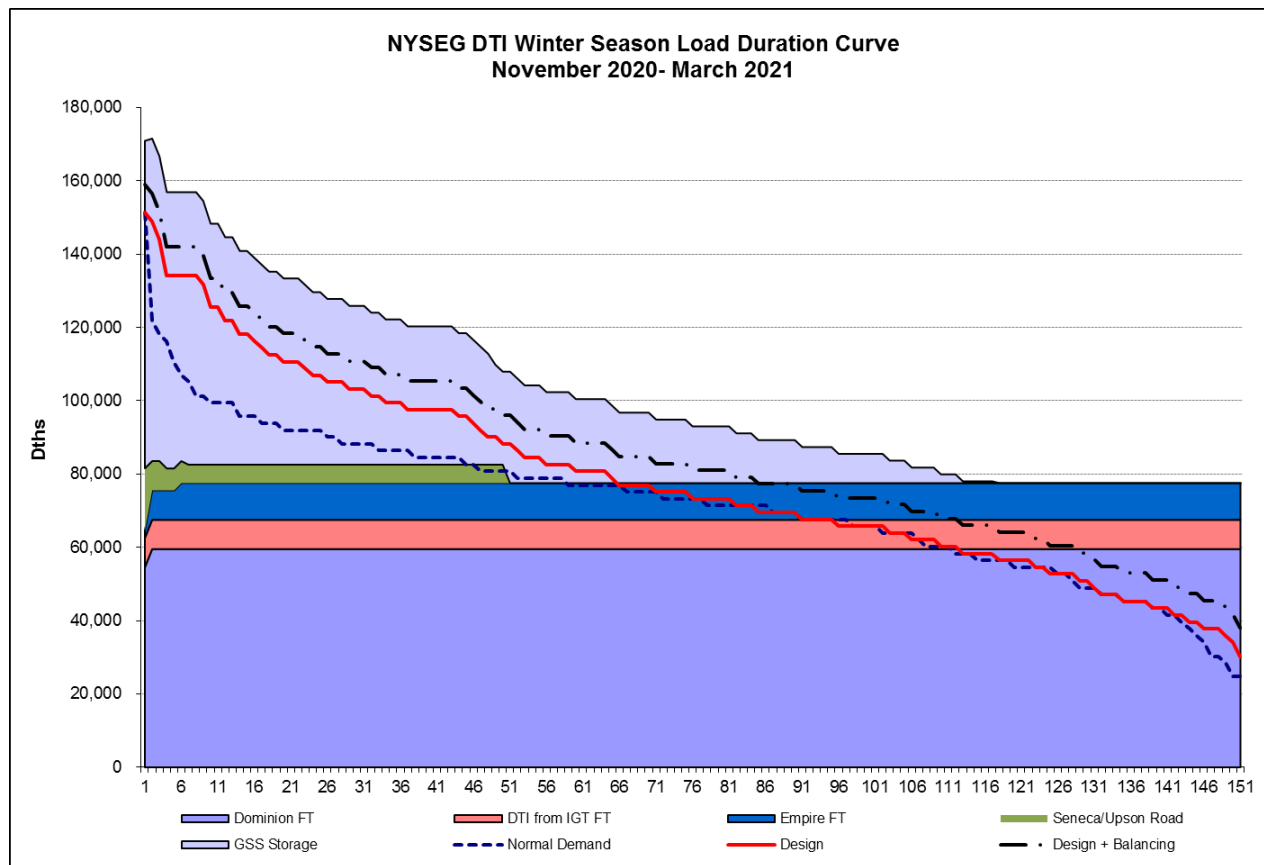
A winter season load duration curve for 2020-2021 send out year that shows how supplies can meet a severe winter season and peak design day. This should be provided for each service area (or gate when indicated). Include all data in an unlocked digital Microsoft Excel file.

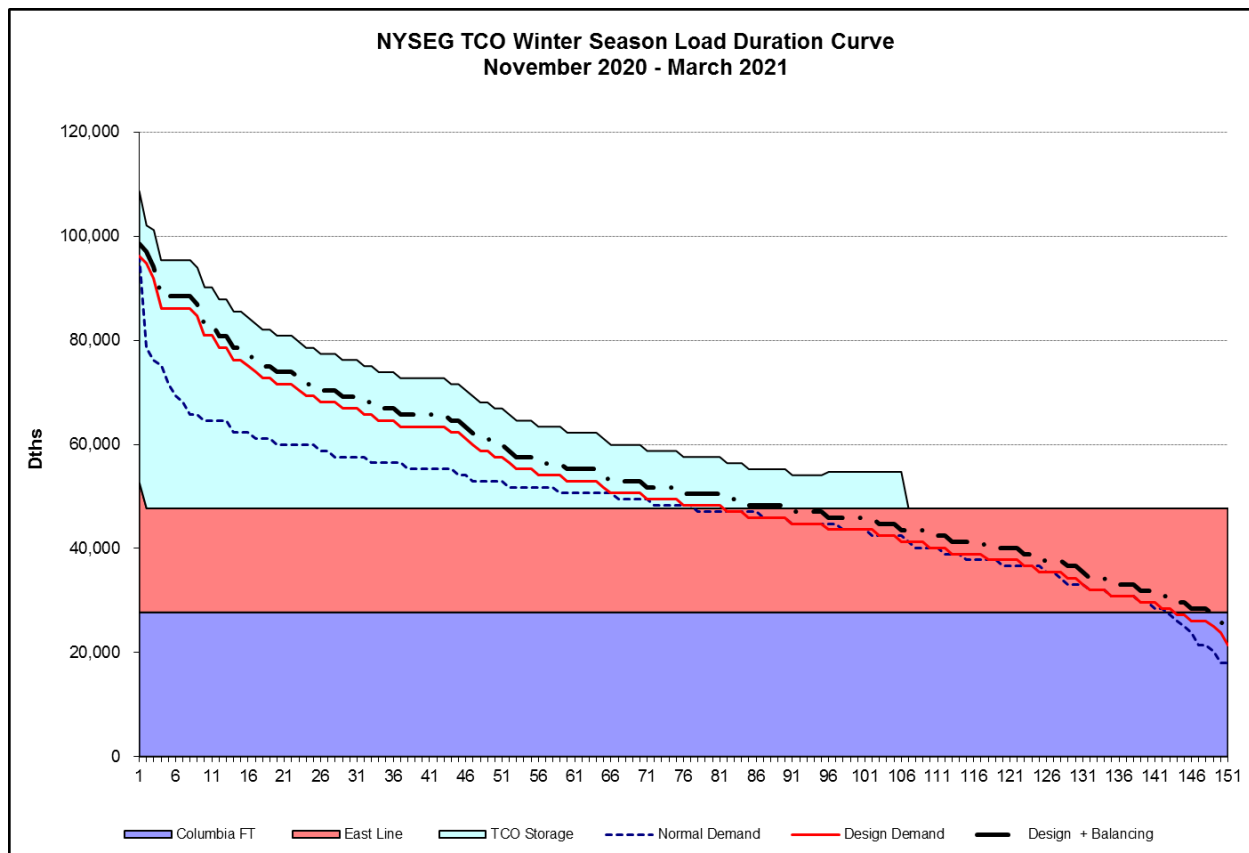
Response

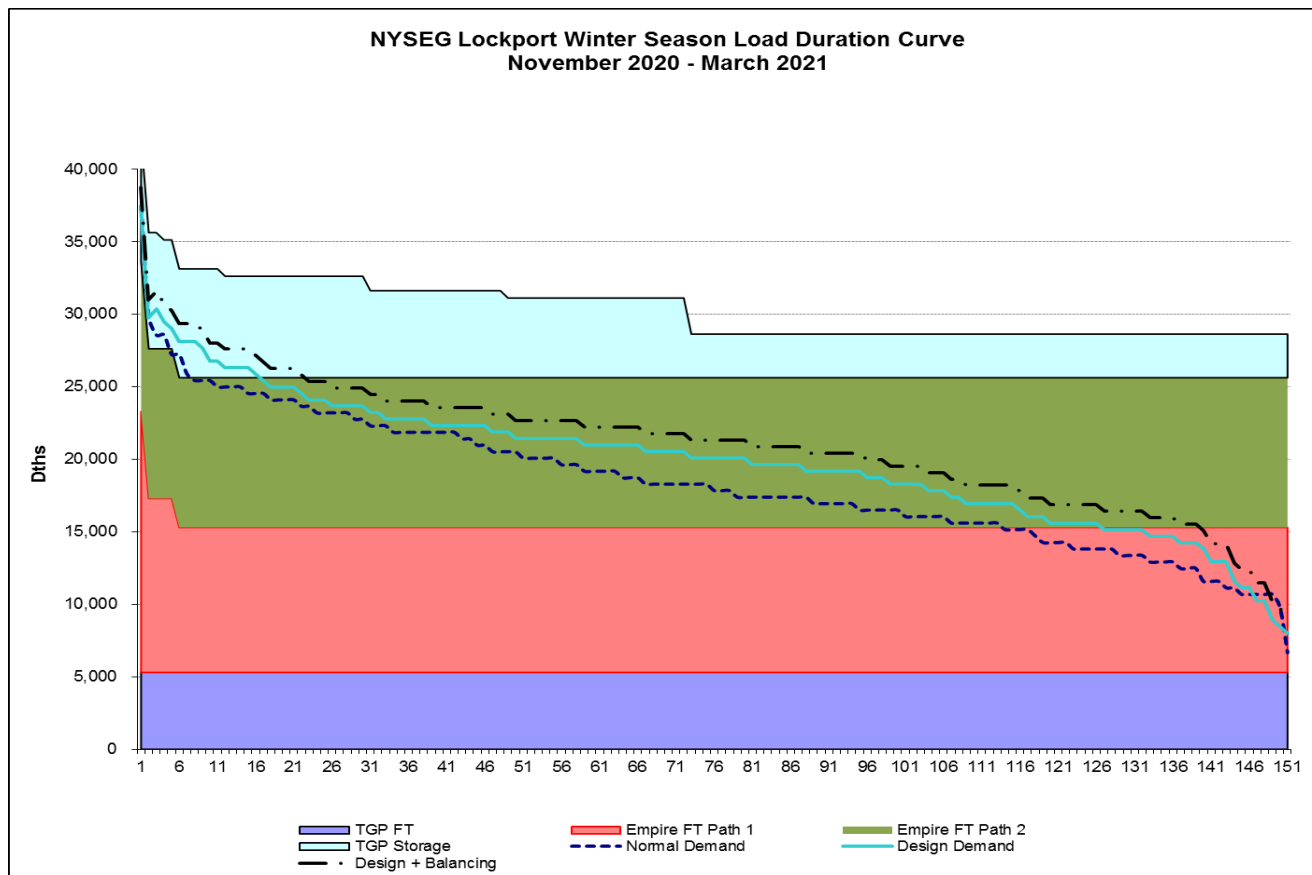
Please find the following 2020-2021 winter season load duration curves for the following areas on the next six (6) pages:

1. NYSEG – Dominion (DTI)
2. NYSEG – Columbia (TCO)
3. NYSEG – Lockport (TGP)
4. NYSEG – North Country
5. NYSEG – Brewster (O&R)
6. NYSEG – Goshen (O&R)
7. RG&E

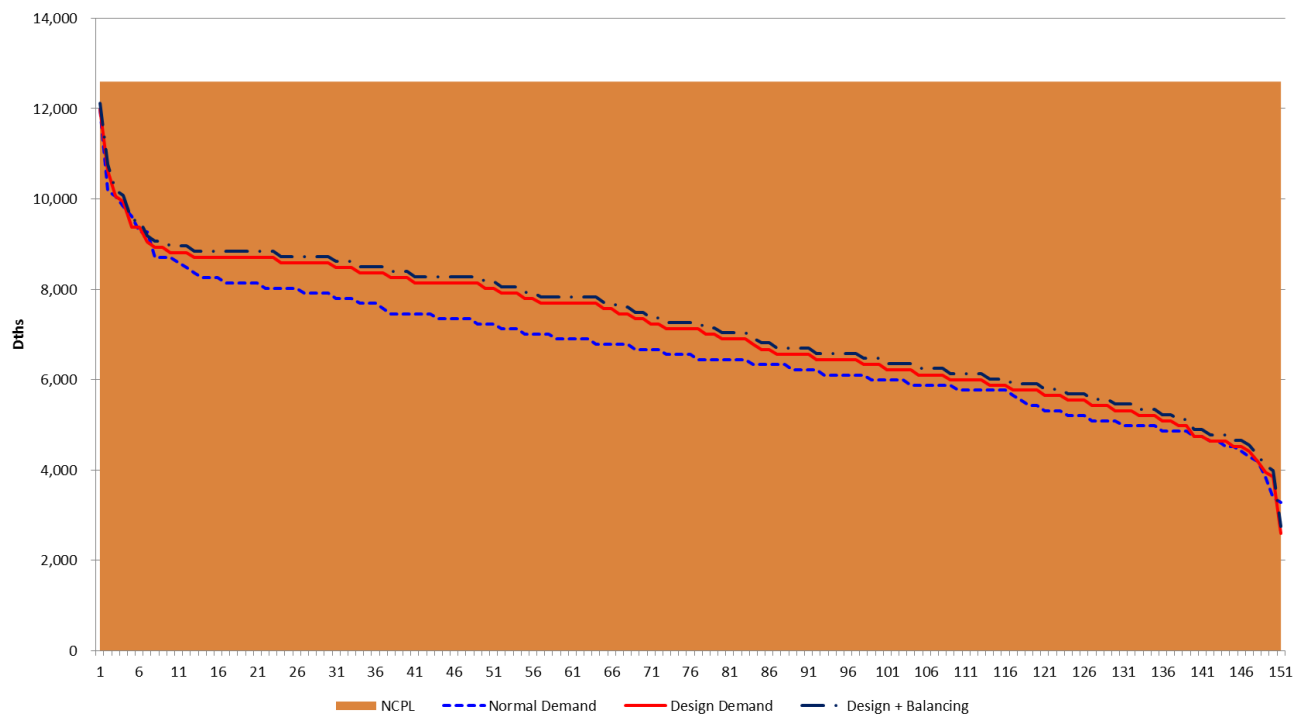




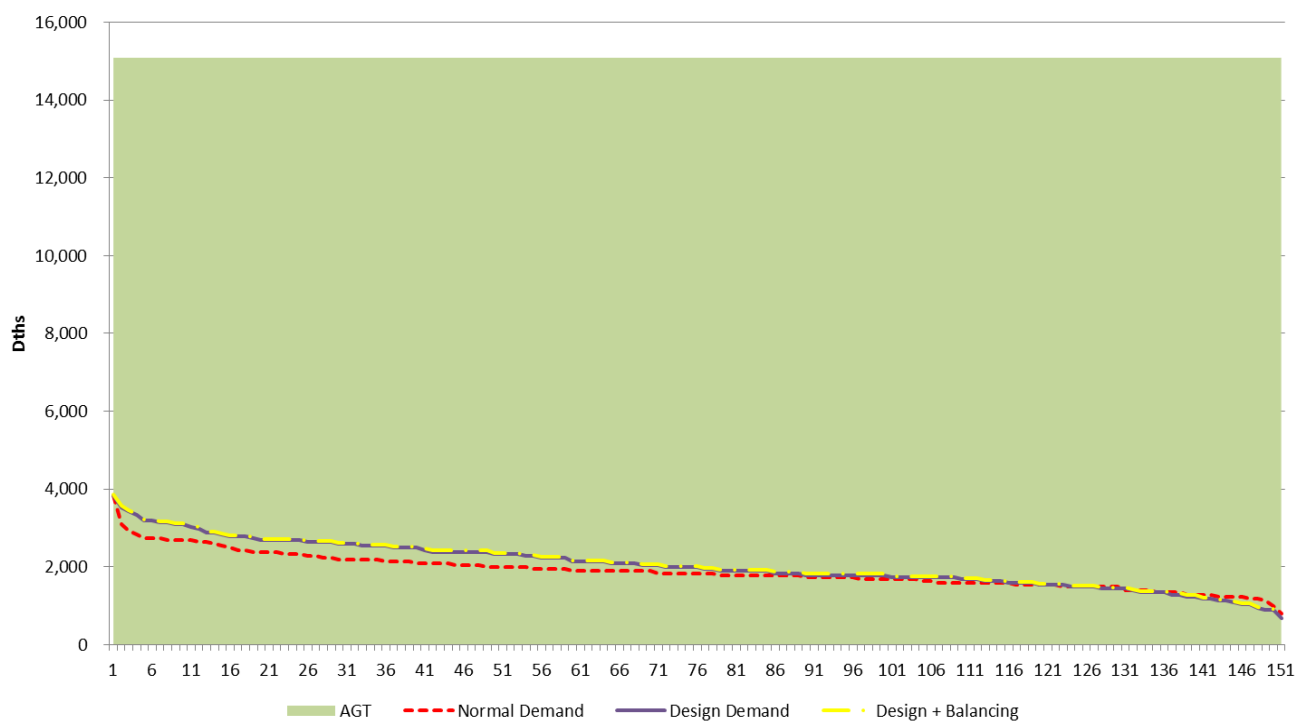


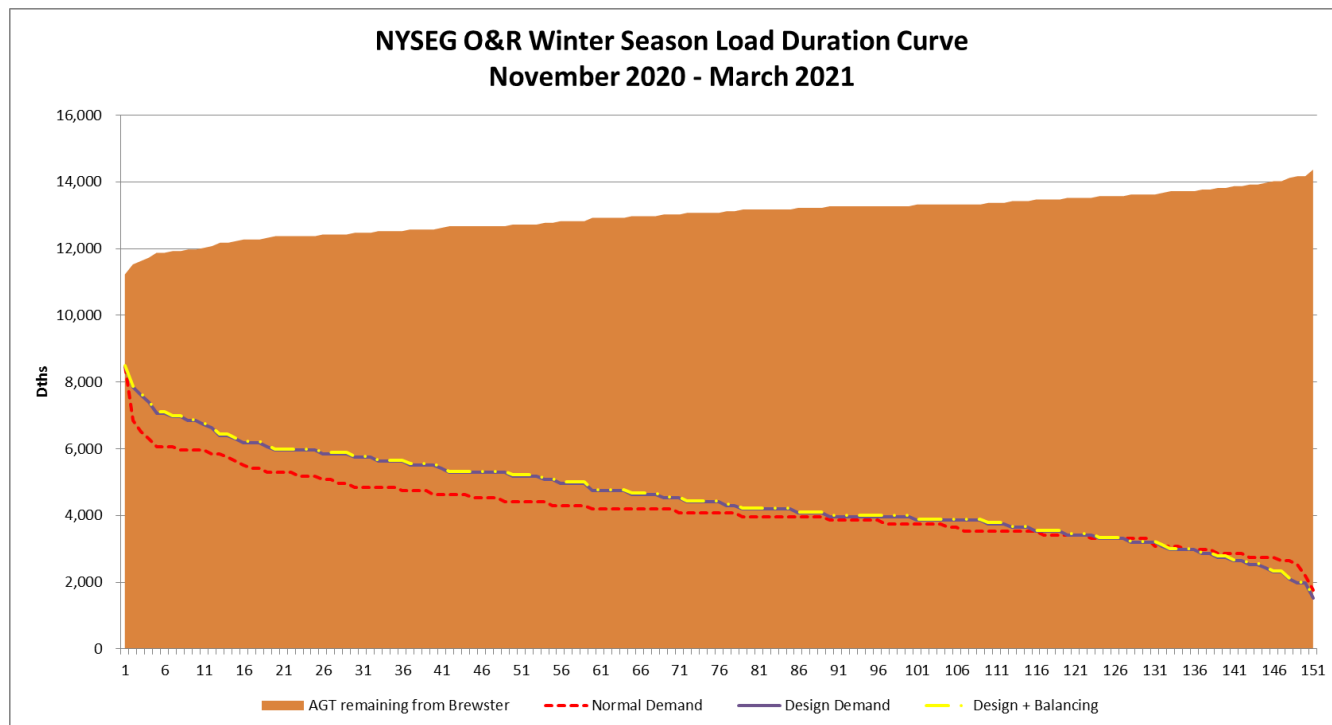


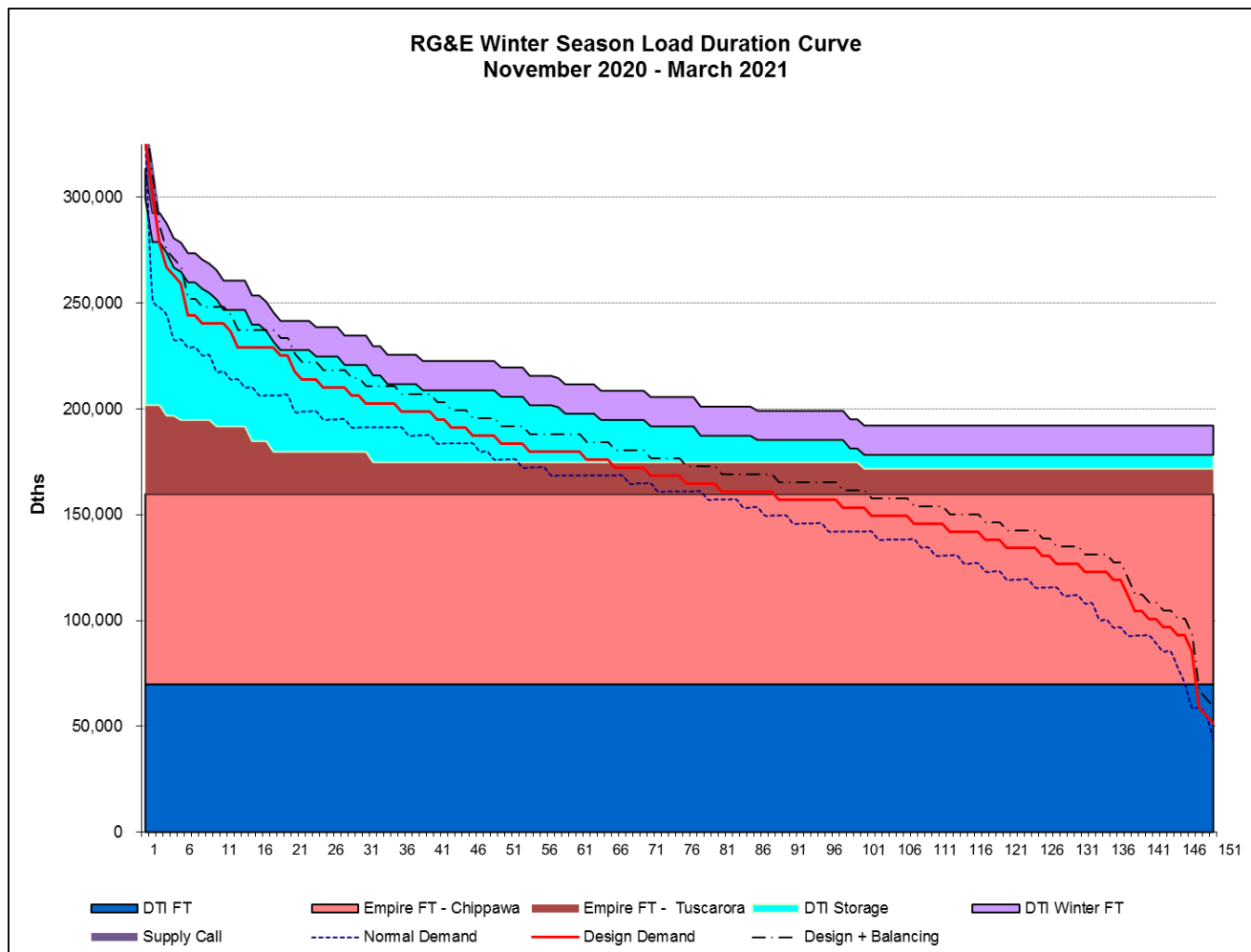
**NYSEG NCPL Winter Season Load Duration Curve
November 2020 - March 2021**



NYSEG Brewster Winter Season Load Duration Curve November 2020 - March 2021







Data Request 9 – Historical Peak Day Takes vs. Contractual Entitlements

For each contracted pipeline, provide the historical winter peak day aggregated takes for the past five years versus the aggregated daily quantity limit. This analysis should also be provided separately on a portfolio-wide basis for all of New York. For the same historical peak day data provide hourly and daily maximums for each take station versus the contractual limits for each take station.

Response

Please see the tables below outlining historical winter peak day aggregated takes for the last five years for NYSEG's respective service areas and RG&E. Also shown below are the peak day hourly and daily maximums by gate station for the last five years. NYSEG and RG&E's gate stations are not individually limited by contract quantity, rather contractual limits are considered to be MDTQ's by pipeline.

Peak Day Pipeline/Pooling Area	February 14, 2020			January 30, 2019			January 5, 2018			January 8, 2017			February 13, 2016		
	HDD	Total	Non-Daily	HDD	Total	Non-Daily	HDD	Total	Non-Daily	HDD	Total	Non-Daily	HDD	Total	Non-Daily
DTI	61	201,779	149,795	68	239,776	181,187	66	242,201	182,896	57	199,095	147,116	73	238,862	182,486
TCO	61	100,972	83,989	68	120,081	101,309	66	130,307	103,828	57	103,256	84,813	73	120,220	102,147
TGP/ESP	55	46,227	33,387	65	57,329	43,265	64	54,646	40,719	50	45,990	33,151	68	52,710	39,347
North Country	67	12,154	9,282	57	11,753	9,001	68	15,256	10,531	55	12,206	8,013	74	14,516	9,842
AGT - Goshen	47	6,818	6,652	52	8,152	7,964	63	8,674	8,462	52	7,198	7,131	60	8,505	8,287
AGT - Brewster	47	3,623	3,216	52	4,410	3,875	58	4,869	4,197	52	3,741	3,314	60	4,265	3,827
IGT	67	3,948	1,904	57	4,433	1,886	68	4,411	2,062	55	3,579	1,706	74	3,311	2,020
Total		375,521	288,225		445,934	348,487		460,364	352,695		375,065	285,244		442,389	347,956

Peak Day Pipeline/Pooling Area	February 14, 2020			January 30, 2019			January 5, 2018			January 8, 2017			February 13, 2016		
	HDD	Total	Firm SC 1&5	HDD	Total	Firm SC 1&5	HDD	Total	Firm SC 1&5	HDD	Total	Firm SC 1&5	HDD	Total	Firm SC 1&5
RG&E (DTI & ESP)	58	399,202	317,039	64	494,322	393,294	62	462,596	376,150	51	366,058	301,872	68	448,869	376,940
Total		399,202	317,039		494,322	393,294		462,596	376,150		366,058	301,872		448,869	376,940



NYSEG Historical Peak Day and Hourly Maximum Data										
	Winter 2019_2020		Winter 2018_2019		Winter 2017_2018		Winter 2016_2017		Winter 2015_2016	
Total Peak (Dth/Day)	377,027	2/14/2020	446,812	1/30/2019	460,506	1/6/2018	375,386	1/8/2017	443,270	2/13/2016
Station	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)
Gate Station 1	9,713.2	556.3	9,576.6	515.0	10,718.6	535.4	5,769.9	318.8	9,674.8	494.0
Gate Station 2	14,953.3	741.4	18,132.5	880.1	17,918.4	858.8	14,614.2	670.5	18,684.9	901.4
Gate Station 3	151.4	7.9	189.7	9.0	176.6	8.0	144.1	7.0	175.6	8.5
Gate Station 4	117.9	6.2	149.7	8.3	163.9	8.2	155.5	9.3	186.5	9.3
Gate Station 5	1,733.8	93.7	2,210.2	111.0	2,171.4	102.6	2,220.9	101.4	3,622.5	160.9
Gate Station 6	157.5	8.2	196.8	9.3	189.8	8.2	146.4	7.2	187.5	9.2
Gate Station 7	16,849.0	903.0	19,960.2	947.8	20,156.5	8,638.0	16,135.0	803.5	19,522.6	908.6
Gate Station 8	3,609.1	190.7	4,383.8	241.9	4,865.1	221.4	3,721.8	215.3	4,243.0	219.1
Gate Station 9	3,864.4	173.3	4,399.2	203.4	4,386.2	229.0	3,557.8	227.6	3,294.0	180.7
Gate Station 10	1,828.9	88.6	1,715.3	95.8	2,047.7	92.7	1,651.6	87.5	2,093.0	99.9
Gate Station 11	840.4	42.7	900.7	44.5	885.4	41.4	725.0	38.2	853.3	41.3
Gate Station 12	186.7	10.3	250.4	12.3	227.1	10.6	190.2	9.2	230.2	11.4
Gate Station 13	1,186.2	51.5	1,141.2	61.9	2,761.3	121.1	2,287.9	107.6	2,753.0	119.3
Gate Station 14	103.9	8.4	102.2	6.2	142.8	7.3	103.6	5.2	145.2	7.3
Gate Station 15	21,123.9	1,250.1	18,603.2	932.9	9,995.3	451.3	15,408.2	666.1	15,978.0	708.3
Gate Station 16	0.0	0.0	1.0	1.0	85.2	17.5	84.2	16.4	84.2	17.5
Gate Station 17	6,594.9	332.0	6,916.0	342.4	7,527.0	338.7	6,591.6	324.3	8,022.7	382.9
Gate Station 18	114.9	9.1	0.0	0.0	784.4	40.3	604.1	31.2	507.0	28.2
Gate Station 19	380.7	20.0	449.3	23.1	424.0	19.6	356.3	19.5	402.5	19.5
Gate Station 20	2,928.1	148.1	3,552.2	181.0	3,525.7	154.0	2,994.3	165.6	2,726.6	140.9
Gate Station 21	13,813.7	659.9	14,955.2	736.0	15,336.0	689.3	13,966.8	655.7	16,194.0	814.7
Gate Station 22	1,108.2	56.7	1,218.7	57.4	1,252.5	58.6	1,039.3	53.9	892.2	43.1
Gate Station 23	692.9	35.9	886.0	42.1	870.6	36.4	692.8	33.9	823.0	39.1
Gate Station 24	12,460.6	588.0	14,898.7	687.8	14,606.5	647.4	11,126.8	609.3	13,824.9	662.8
Gate Station 25	14,426.6	730.0	15,551.6	771.4	16,005.0	734.1	12,818.9	635.4	15,710.5	728.6
Gate Station 26	1,313.8	61.9	1,555.7	75.1	1,470.1	64.8	1,285.6	59.7	1,686.4	73.1
Gate Station 27	8,184.6	430.2	10,710.7	501.1	9,917.5	415.9	8,049.8	373.8	9,365.1	448.4
Gate Station 28	624.3	31.8	790.8	39.4	864.4	38.9	709.5	33.1	1,193.4	54.3
Gate Station 29	604.6	31.9	649.8	30.9	850.5	38.1	265.4	19.5	804.9	35.0
Gate Station 30	10,420.4	591.5	12,718.1	667.1	9,969.9	635.0	12,704.5	685.2	3,574.0	343.0
Gate Station 31	7,622.3	383.7	9,613.1	450.6	9,249.8	420.3	7,433.4	362.0	8,626.9	410.8
Gate Station 32	6,044.7	309.7	7,140.7	376.5	7,515.6	337.4	6,386.3	331.4	7,333.6	351.8
Gate Station 33	2,043.0	107.2	2,327.0	114.1	2,382.4	109.1	1,911.4	98.8	2,261.5	112.2
Gate Station 34	953.8	46.2	996.2	42.1	1,039.8	44.1	1,039.3	44.1	1,043.0	44.1
Gate Station 35	664.2	32.9	781.6	42.2	804.7	37.0	701.3	36.0	833.1	40.1
Gate Station 36	12,774.3	606.1	15,613.4	716.0	14,542.5	667.4	11,620.1	545.1	12,247.1	568.9
Gate Station 37	12,635.7	611.5	15,305.7	747.7	14,864.9	683.7	12,995.0	637.5	15,490.1	700.9
Gate Station 38	4,225.7	207.7	5,596.7	281.7	5,492.3	256.6	4,673.5	241.6	4,804.3	226.3
Gate Station 39	21,902.0	998.4	11,356.5	522.3	10,798.8	463.2	11,606.8	511.9	12,764.3	566.1
Gate Station 40	1,168.6	63.9	1,622.8	80.2	1,430.8	66.7	1,311.6	65.5	1,447.5	76.8
Gate Station 41	2,196.4	115.3	2,242.5	127.5	2,874.2	134.8	2,271.3	117.3	2,880.4	143.0



NYSEG Historical Peak Day and Hourly Maximum Data Continued										
Winter 2019_2020		Winter 2018_2019		Winter 2017_2018		Winter 2016_2017		Winter 2015_2016		
Station	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)
Gate Station 42	0.0	0.0	239.7	60.4	0.0	0.0	0.0	0.0	0.0	0.0
Gate Station 43	13,298.7	653.4	34,556.0	1,613.8	36,041.4	1,603.3	29,223.1	1,356.9	34,668.9	1,573.1
Gate Station 44	584.5	29.6	680.2	33.8	697.9	32.1	595.9	30.4	687.5	31.7
Gate Station 45	832.1	42.8	870.0	44.4	902.0	42.2	623.6	33.6	1,031.5	51.2
Gate Station 46	4,968.4	239.5	5,492.1	264.7	5,577.0	243.1	4,270.6	215.5	4,629.9	223.9
Gate Station 47	10,903.2	494.2	10,547.0	531.2	12,405.1	552.8	9,938.7	510.2	11,723.8	526.0
Gate Station 48	27,266.3	1,393.1	33,585.8	1,644.0	34,728.3	1,603.2	26,873.0	1,366.6	33,574.4	1,624.3
Gate Station 49	66.7	4.1	78.0	4.1	71.9	4.1	60.6	3.1	73.0	4.1
Gate Station 50	1,058.4	54.0	1,305.3	62.3	1,178.5	52.2	992.1	49.1	1,125.0	54.4
Gate Station 51	400.9	20.2	425.3	22.9	450.7	20.9	356.8	17.8	450.7	22.0
Gate Station 52	18,267.0	791.6	17,743.8	894.0	17,126.1	844.9	17,043.2	731.3	19,912.6	882.3
Gate Station 53	22,898.7	1,205.9	34,058.6	1,654.1	31,251.3	1,496.3	23,795.9	1,181.0	26,711.3	1,332.5
Gate Station 54	1,043.7	49.3	1,037.7	46.9	1,095.3	49.4	998.9	48.8	890.4	37.1
Gate Station 55	9,896.6	501.9	10,866.4	537.7	10,809.5	481.5	8,475.0	447.8	10,873.5	523.5
Gate Station 56	2,971.3	125.4	5,829.1	243.7	6,145.4	256.8	4,273.6	178.5	5,696.7	250.5
Gate Station 57	4,815.1	219.7	4,480.2	232.0	5,091.0	244.3	5,156.4	228.9	5,652.1	249.7
Gate Station 58	9,070.3	555.2	13,872.5	865.7	23,888.4	1,104.4	12,936.8	750.6	18,707.0	1,010.1
Gate Station 59	8,238.5	426.7	11,857.9	550.1	10,815.2	490.6	10,360.9	485.3	10,371.7	492.7
Gate Station 60	8,083.5	349.2	8,134.3	352.8	10,141.0	435.7	5,105.9	215.7	15,125.1	656.5
Gate Station 61	1,342.5	68.7	1,577.9	85.2	1,723.8	76.9	1,429.1	73.9	1,725.0	85.1
Gate Station 62	1,101.5	52.7	1,345.6	62.0	1,311.5	58.6	998.9	50.0	1,208.0	59.6
Gate Station 63	1,057.8	53.1	1,236.3	61.2	1,223.3	56.0	1,035.6	61.0	1,277.4	63.7
Gate Station 64	400.8	21.0	506.9	23.4	485.7	21.6	367.6	16.8	467.5	21.0
Gate Station 65	6,201.7	349.0	7,141.3	463.5	7,937.2	360.1	6,695.3	344.1	8,113.2	412.1
Gate Station 66	894.7	46.0	979.2	46.4	9,157.5	496.8	2,746.5	502.8	2,429.4	469.0
TOTAL:	377,027		446,812		460,506		375,386		443,270	



RG&E Historical Peak Day and Hourly Maximum Data										
	Winter 2019_2020		Winter 2018_2019		Winter 2017_2018		Winter 2016_2017		Winter 2015_2016	
Total Peak (Dth/Day)	399,669	2/14/2020	494,842	1/30/2019	463,426	1/5/2018	366,319	1/8/2017	451,447	2/13/2016
Station	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)	Total (Dth/Day)	Hourly Max (Dth)
Gate Station 1	125.7	7.2	143.1	7.2	145.2	7.2	85.4	6.2	94.7	5.2
Gate Station 2	203,181.3	11,478.8	229,387.6	10,684.2	177,286.6	9,883.6	219,563.5	10,748.5	232,289.5	11,871.8
Gate Station 3	58,527.4	2,614.7	102,717.0	4,294.3	101,233.6	4,757.2	3,028.5	986.4	20,885.3	2,149.2
Gate Station 4	5,354.2	257.1	6,294.6	289.9	5,950.3	269.6	4,661.6	228.6	5,534.4	260.8
Gate Station 5	4,506.6	227.9	5,491.2	258.8	5,146.4	231.6	4,160.2	201.5	5,309.2	250.3
Gate Station 6	3,564.0	171.4	4,369.4	194.4	4,334.0	193.5	3,335.6	162.3	4,249.4	199.8
Gate Station 7	106,895.8	4,797.8	127,170.6	7,273.9	150,068.0	6,439.5	111,798.2	4,906.0	159,902.2	7,101.4
Gate Station 8	2,895.1	141.2	4,427.0	205.1	4,261.7	185.9	3,444.3	164.1	4,023.8	193.0
Gate Station 9	10,724.3	515.2	10,132.9	452.7	10,491.9	488.6	12,670.7	659.8	14,812.0	698.3
Gate Station 10	2,210.9	111.3	2,505.8	114.2	2,224.5	101.2	1,804.0	84.5	2,217.6	110.6
Gate Station 11	2.0	2.0	7.1	2.0	13.2	2.0	0.0	0.0	0.0	0.0
Gate Station 12	1,681.8	83.6	2,195.2	101.1	2,270.4	100.2	1,766.9	87.0	2,128.9	102.4
TOTAL:	399,669		494,842		463,426		366,319		451,447	

Data Request 10 – Hourly Forecasting Data

Does the Company forecasting department provide hourly forecasting by gate stations to the Energy Procurement group responsible for evaluating interstate pipeline capacity needs? If so, is this information being considered for evaluating hourly peak needs at individual gate stations for the purposes of design day capacity and supply planning?

Response

The Load Forecasting group does not provide hourly forecasting by gate station to the Energy Procurement Group.

Data Request 11 – Exceeding Design Day Forecast and Capacity Planning

Provide a long-range plan by gate station showing a forecast for when a design hour and/or a design day will be exceeded. Indicate a forecast of need for additional pipeline capacity, or in lieu of capacity, implementation of incremental demand-side or supply-side solutions. The forecast should use a reasonable actual peak day demand growth trend associated with only firm (core) customers.

Response

The Companies long term natural gas forecasts, developed by the Load Forecasting group, are at the total system level for NYSEG and RG&E. Individual forecasts are not completed at the city gate or pipeline level.

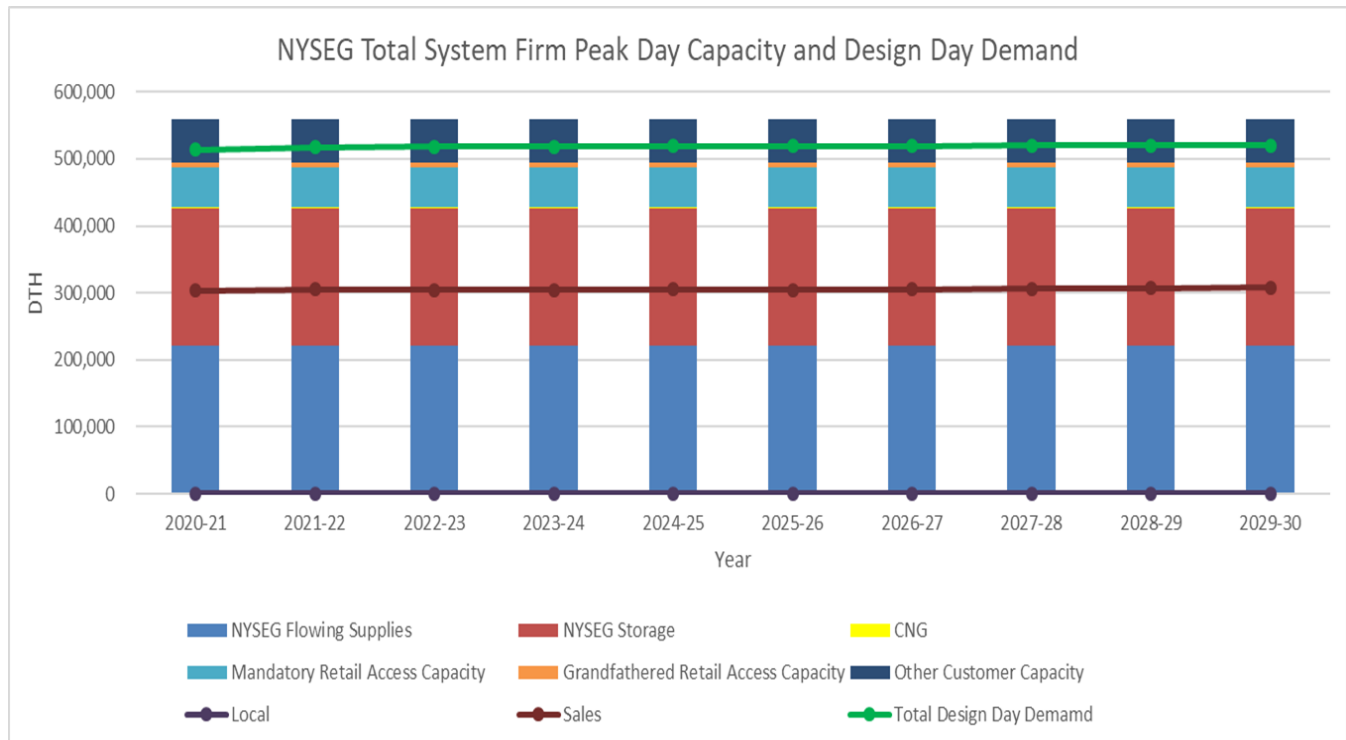
NYSEG has sufficient resources to meet the 10-year design day demand on a total system basis, and for the Dominion, Columbia, Lockport, Brewster and Plattsburgh load areas. Analysis shows a forecast supply/demand deficit for the Goshen area beginning with the 2021-2022 winter season. NYSEG is in



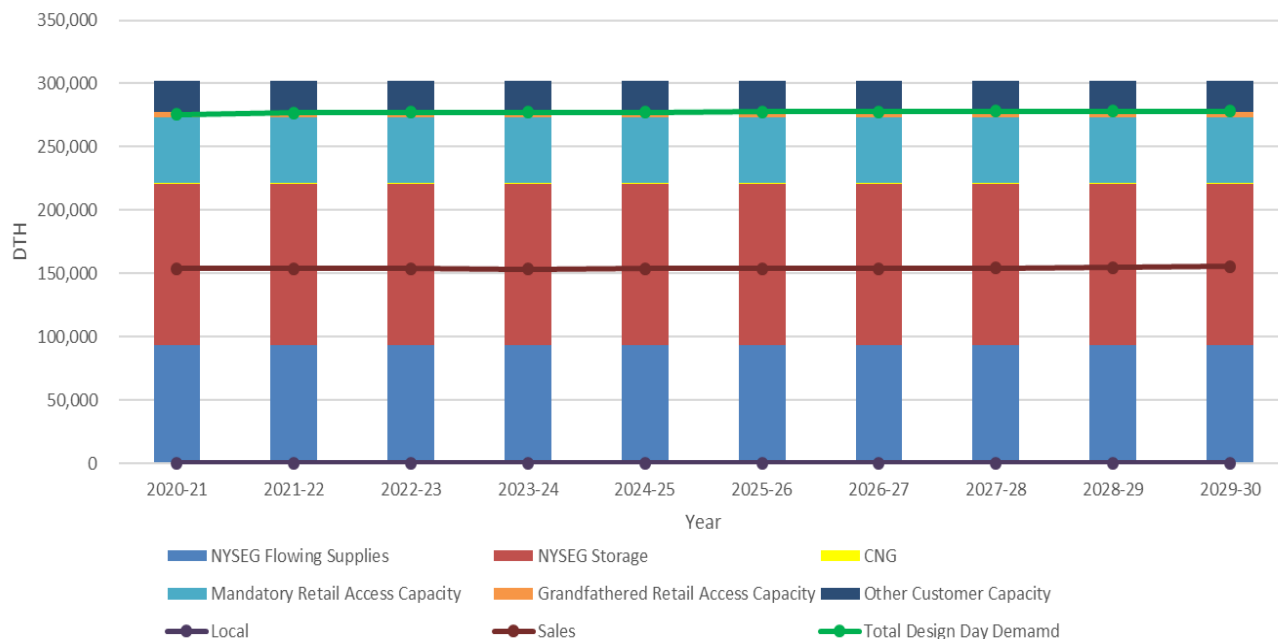
the midst of negotiations with a counterparty to obtain adequate capacity to serve incremental load in the Goshen area.

RG&E has sufficient resources to meet the 10-year design day demand on a total system basis.

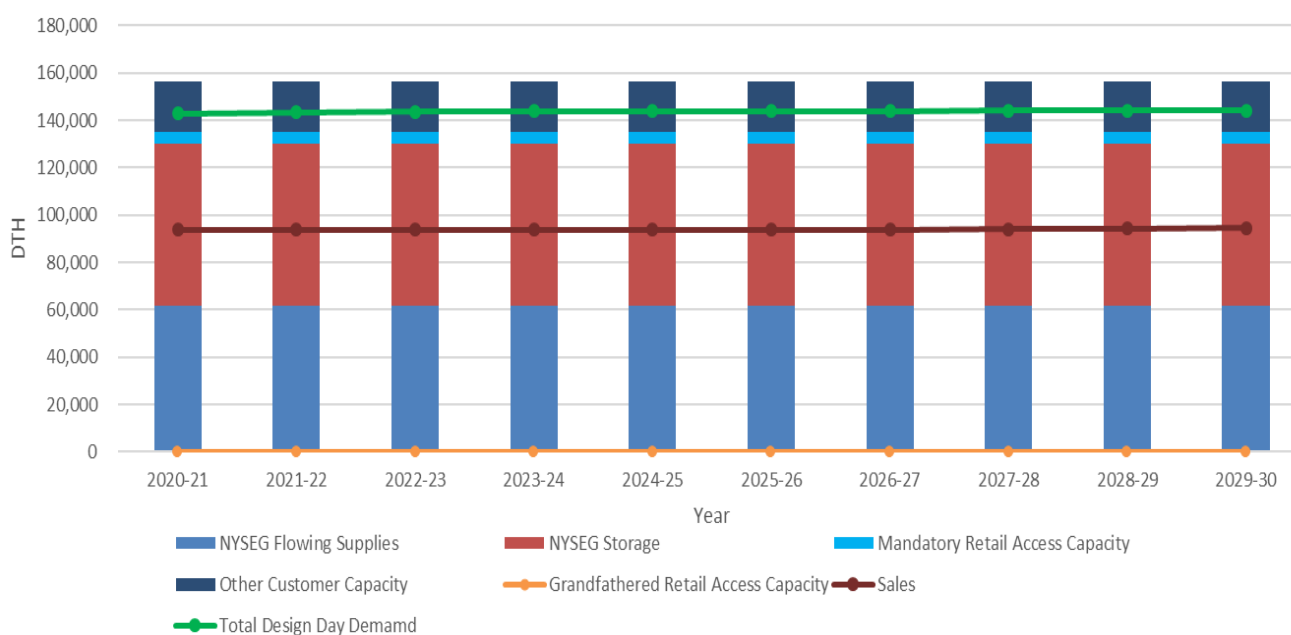
The Companies are obligated to hold capacity for firm non-daily metered customers, daily metered critical care customers without an alternate fuel, and daily metered customers taking service under Standby or Sales Reservation tariff designations. Additionally, the Companies are obligated to hold 5% of their capacity assets for balancing services for daily metered customers.



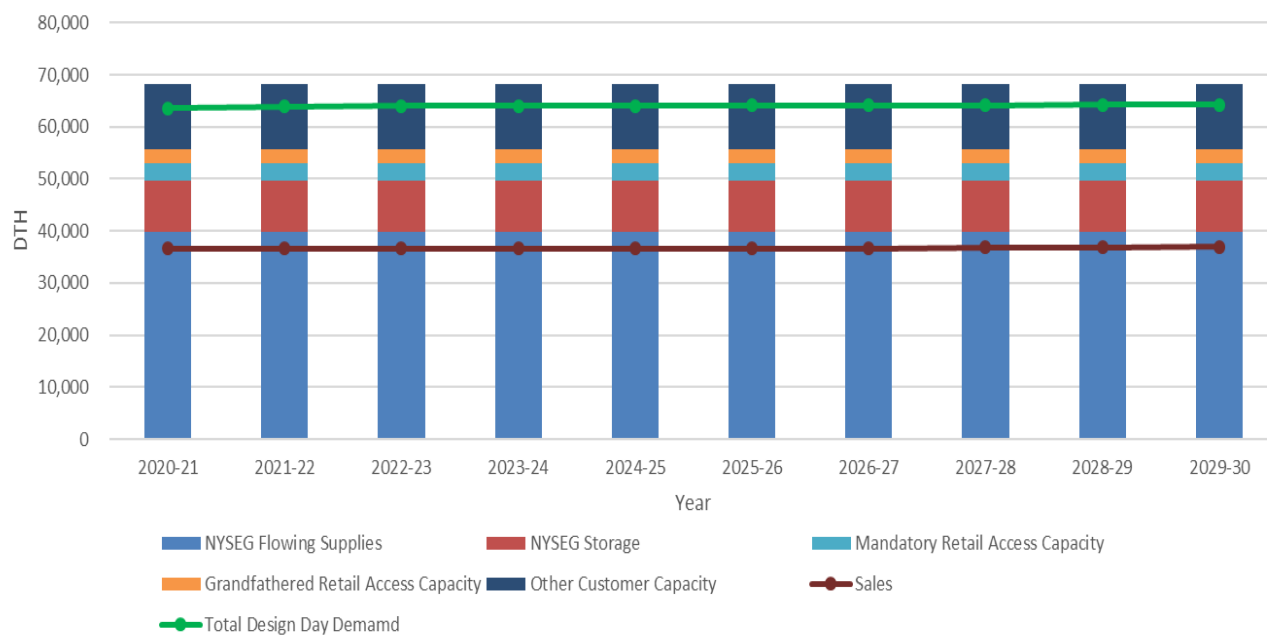
NYSEG Dominion System Firm Peak Day Capacity and Design Day Demand



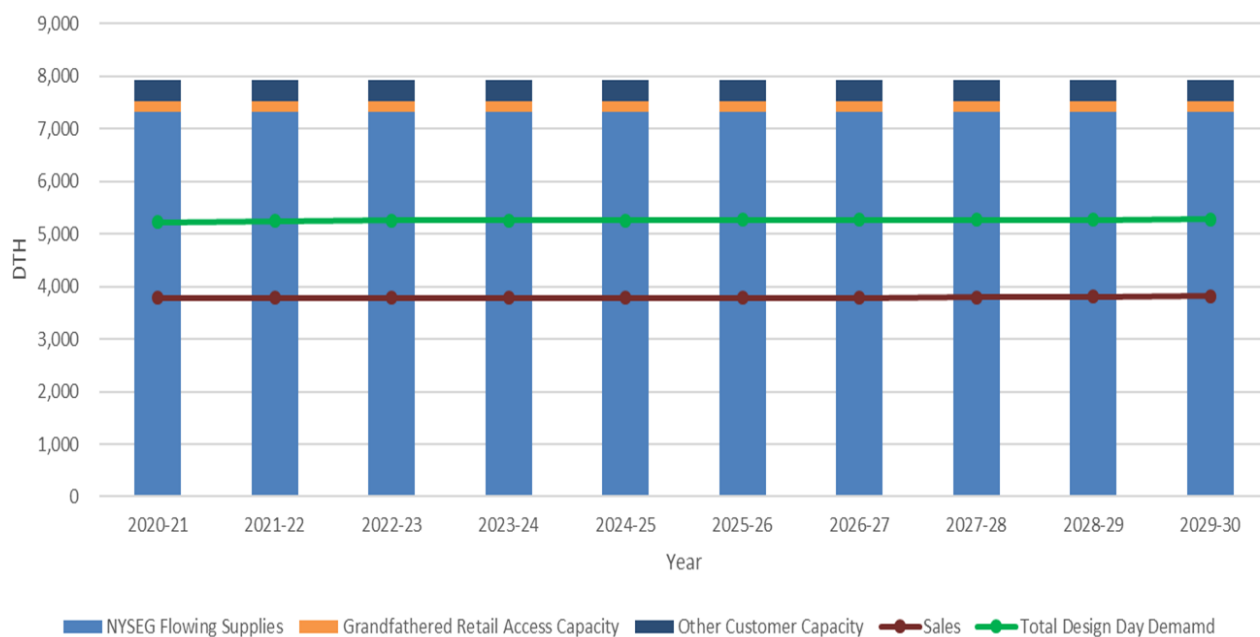
NYSEG Columbia System Firm Peak Day Capacity and Design Day Demand



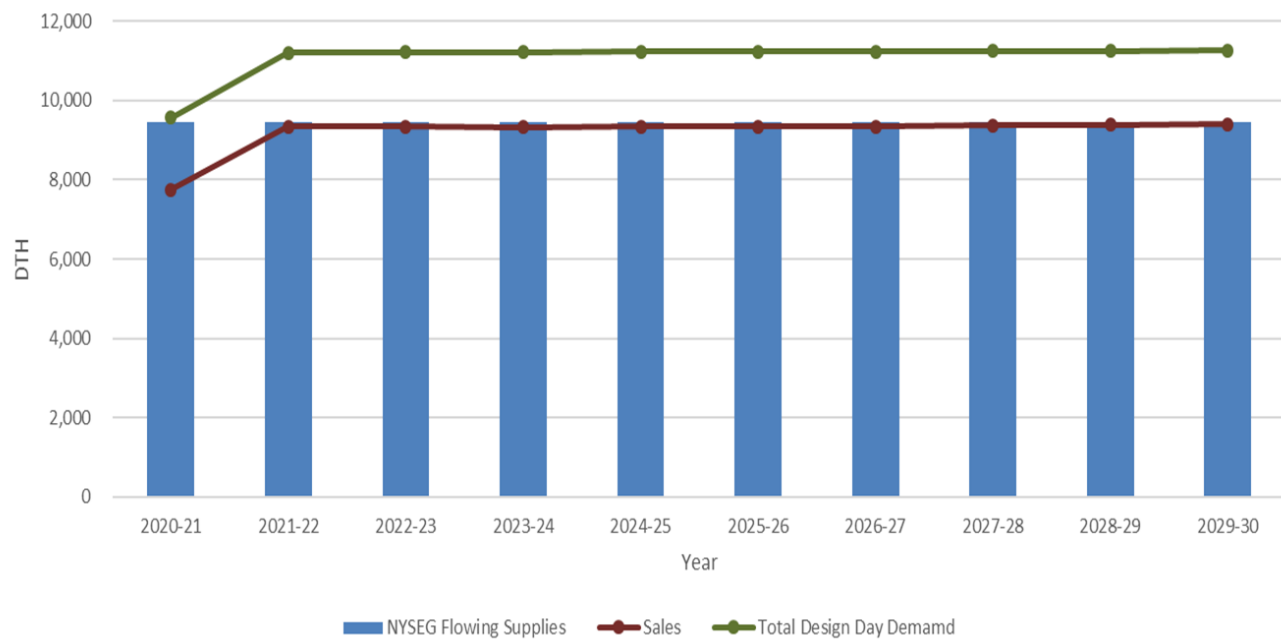
NYSEG Lockport Area System Firm Peak Day Capacity and Design Day Demand



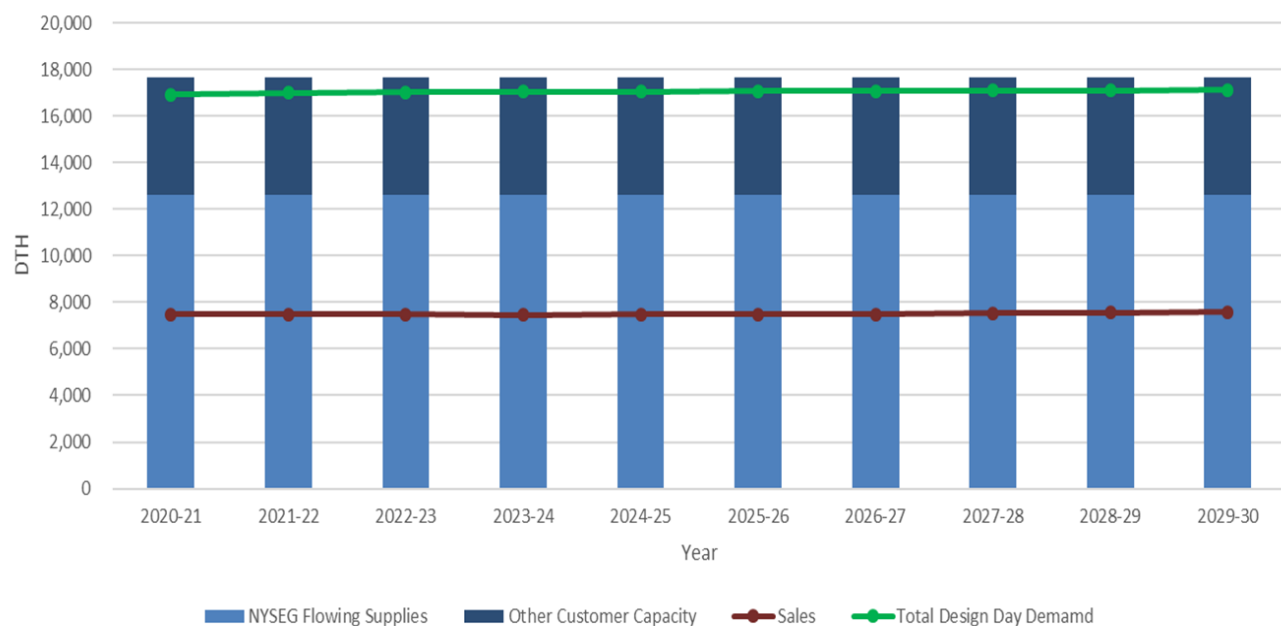
NYSEG Brewster System Firm Peak Day Capacity and Design Day Demand

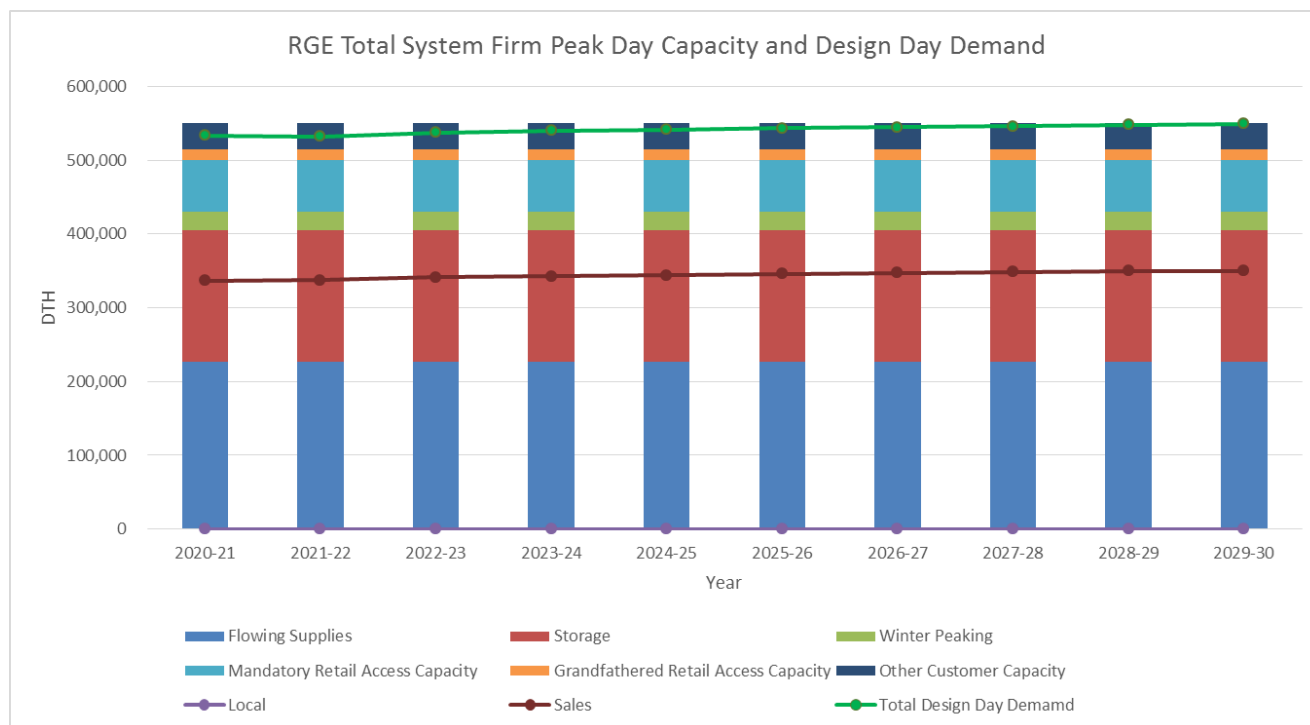


NYSEG Goshen System Firm Peak Day Capacity and Design Day Demand



NYSEG NCPL System Firm Peak Day Capacity and Design Day Demand





Data Request 12 – Effects on Flow due to Pipeline Limitations

For each gate station, indicate how much hourly flow would be lost in terms of dekatherms per hour if the specific pipeline in question limited your utility to 1/24th of its daily contract volume rather than 1/20th of its daily contract volume.

Response

As outlined in [Data Request 9](#), NYSEG and RG&E's gate stations are not individually limited by contract quantity, rather contractual limits are considered to be MDTQ's by pipeline.

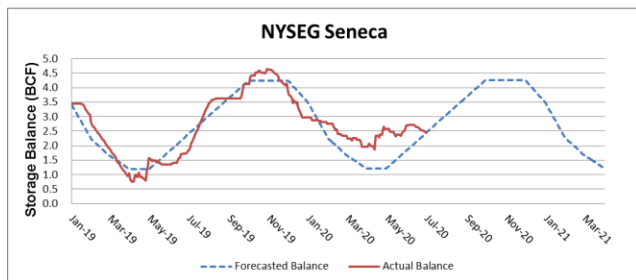
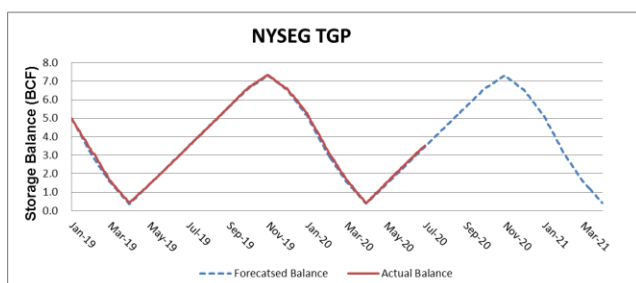
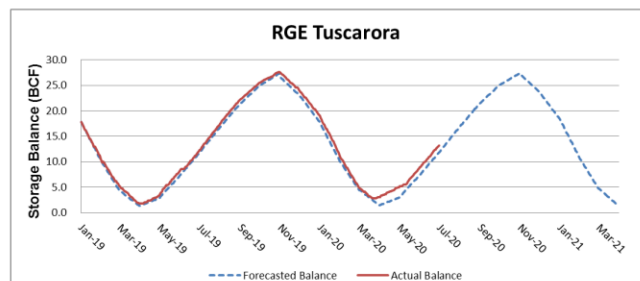
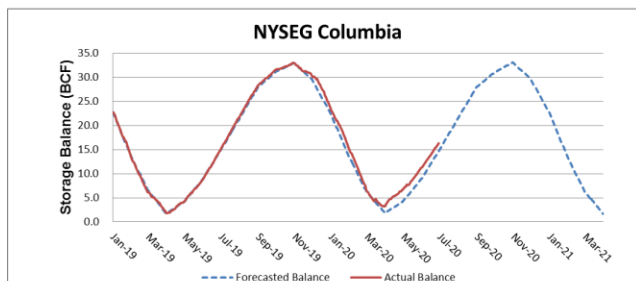
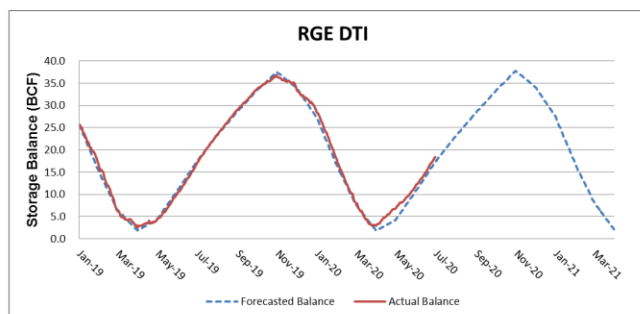
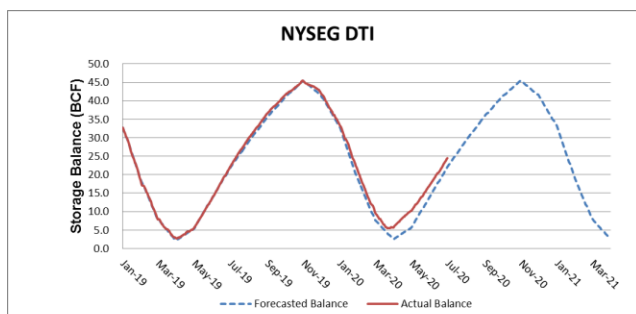
Data Request 13 – Storage Curves

Provide this year's and last year's planned storage curves versus actual storage curves for injections and withdrawals.

Response

The following graphs represent the planned and actual storage curves for NYSEG and RG&E. The following storage curves are net of retail access migration. Actuals are through June 30, 2020.





Data Request 14 – Storage Injection Plan

Describe the storage injection plan for this injection season and highlight any modifications from the prior year plan. How is the relatively warm winter of 2019-2020 affecting your storage injection season and how will it be addressed?

Response

NYSEG and RG&E's storage injection plan is similar from year to year due to pipeline tariff requirements. Although the percentages change slightly from year to year there are no modifications to the plan.

New York State Electric & Gas					Rochester Gas & Electric		
End of :	DTI GSS (300063)	TCO FSS (80349)	TGP (536)	Arlington (SL00001S)	End of :	DTI GSS (300084)	ESP FSN (G12130)
Apr-19	12%	12%	18%	30%	Apr-19	11%	12%
May-19	29%	25%	31%	26%	May-19	26%	28%
Jun-19	46%	43%	45%	36%	Jun-19	43%	42%
Jul-19	63%	62%	59%	68%	Jul-19	59%	60%
Aug-19	77%	81%	72%	71%	Aug-19	74%	77%
Sep-19	87%	91%	86%	81%	Sep-19	85%	89%
Oct-19	96%	95%	95%	91%	Oct-19	93%	96%

Data Request 15 – Least Cost Dispatch

Provide the method(s) used by the Company to determine or ensure the least cost dispatch when the heating season is warmer than normal.

Response

Although the Companies lock in winter swing term deals, Gas Supply reviews market pricing on a daily basis. This includes using the ICE Platform and communicating with Suppliers and evaluating the gas needs for each of our demand areas, while taking into account reliability factors and storage tariff requirements to serve our customers in a least cost manner. The Companies calculate the daily market delivered cost of gas by location and rank the pricing for least cost dispatch purposes.



Data Request 16 – Must Turn Requirements

Provide the Company must turn requirements for each storage facility(s).

Response

Must turn requirements for each storage facility are as follows:

NYSEG

DTI GSS (300063)	DTI GSS Tariff requires a minimum turnover by April 15 of 35% of SCQ minus Nov 1 inventory
TCO FSS (80349)	TCO FSS Tariff doesn't have a minimum turnover requirement but a balance requirement to be below 25% of MSQ at the end of March
TGP (536)	No must turn requirements
Alrington (SL00001S)	No must turn requirements

RG&E

DTI GSS (300084)	DTI GSS Tariff requires a minimum turnover by April 15 of 35% of SCQ minus Nov 1 inventory
ESP FSNN (G12130)	No must turn requirements

In addition to these requirements, our withdrawal rates are consistent with the need to meet reliability during times of extreme heat and cold. NYSEG and RG&E strive to maintain targets and not hit the first ratchet until mid-February.



Issue 3 (Data Requests 17-35)

Please provide the following information related to your company's operations and optimization procedures:

Data Request 17 – Send Out Schedule Forecasting Requirements

A send out schedule (or curve) for forecasting requirements under the varying conditions that are considered in developing the estimates (e.g., temperature, wind, weekend/weekday, etc.).

Response

The Winter Season Load Duration Curves shown in the response to [Data Request 8](#) illustrate the send out schedule/curve under normal and design conditions for each system. These schedules are derived in the following manner.

The data compiled for the analysis is daily total throughput into the system minus the daily metered transportation throughput to determine non-daily metered (NDM) demand. This NDM demand is regressed against the actual daily heating degree days for a daily firm demand function (see below) The GTS base / heat factors are used to account for the migration of NDM customers to transportation on the NYSEG and RG&E systems. The result will be a firm sales demand for which the LDC will provide gas supply:

Daily Firm Demand = $(A - a_{GTS}) + [(B - b_{GTS}) * W]$ Where:

- A = The baseload required for NDM supply at zero degree days (intercept of the y axis when graphed).
- a_{GTS} = The baseload calculated for the migrating customers. (Usage base factor)
- B = The sensitivity to the weather. A one (1) degree increase in temperature will increase the demand for gas by a factor of B (slope of the linear curve)
- b_{GTS} = The heat load calculated for the migrating customers. (Usage heat factor)
- W = Heating degree days - is a measurement of the temperature calculated by subtracting the average temperature for a day from 65 degrees.



Data Request 18 – Gas Supply Portfolio – Tables 4-6

Gas supply portfolio information (highlight changes as indicated on the charts, including all capacity or supply contracts remaining to be finalized prior to the winter heating season):

a) **Table 4**

Transportation capacity data including contract volumes and expiration dates. Please be prepared to discuss how the capacity is actually used during our meeting.

Response

See [Table 4](#) for NYSEG and RGE, which illustrates the full contractual obligation for each company.



Table 4: Firm Transportation Capacity - Winter 2020-2021

Company: NYSEG
Submission Date: July 15, 2020
Version #: 1

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Winter Quantity (MDT)	Annual Quantity (MDT)	Expiration Date ⁽¹⁾
Flowing Gas To Citygate					
Algonquin Gas Transmission Company - 9225	AFT-1	16,779	2,534	6,124	10/31/2021 (E)
Dominion Energy Transmission, Inc. - 100036	FTNN	80,140	12,101	29,251	03/31/2022 (E)
Dominion Energy Transmission, Inc. - 100120	FTNN	20,000	3,020	7,300	03/31/2025 (E)
Dominion Energy Transmission, Inc. - 200058	FT	8,000	1,208	2,920	03/31/2022 (E)
Dominion Energy Transmission, Inc. - 200392	FT	700	106	256	03/31/2025 (E)
Dominion Energy Transmission, Inc. - 5B7282	FTNN	2,300	347	840	10/31/2025
Empire Pipeline, Inc. - F12132	FTNN	34,816	5,257	12,708	03/31/2021 (E)
Iroquois Gas Transmission System, L.P. - R-520-01	RTS-FT	1,890	285	690	11/01/2022 (E)
Iroquois Gas Transmission System, L.P. - R-520-04	RTS-FT	2,975	449	1,086	09/01/2025
North Country Gas Pipeline Corporation - 734(3)	FT	12,600	1,903	4,599	12/21/2023 (E)
Columbia Gas Transmission, LLC - 80348	FTS	36,794	5,556	13,430	10/31/2024
Tennessee Gas Pipeline Company, L.L.C. - 46732	FT-A	2,490	376	909	10/31/2021
Tennessee Gas Pipeline Company, L.L.C. - 62405	FT-A	4,000	604	1,460	10/31/2024
Tennessee Gas Pipeline Company, L.L.C. - 358864	FT-A	600	91	219	10/31/2025
Total		224,084	33,837	81,791	
Upstream Pipeline Support⁽²⁾					
Iroquois Gas Transmission System, L.P. - R-520-01	RTS	15,309	2,312	5,588	11/01/2022 (E)
Iroquois Gas Transmission System, L.P. - R-520-04	RTS	3,825	578	1,396	09/01/2025
TransCanada PipeLines Limited - 51369	FT	3,000	453	1,095	10/31/2026
TransCanada PipeLines Limited - 58623	FT	6,568	992	2,397	10/31/2033
TransCanada PipeLines Limited - 58624	FT	5,132	775	1,873	10/31/2033
Total		33,834	5,110	12,349	
Deliveries from Storage					
Dominion Energy Transmission, Inc. - 700014	FTNN	110,302	16,656	16,656	03/31/2022 (E)
Columbia Gas Transmission, LLC - 80350	SST	68,514	10,346	25,008	03/31/2025
Tennessee Gas Pipeline Company, L.L.C. - 203	FT-A	9,744	1,471	3,557	10/31/2021
Total		188,560	28,473	45,221	
Winter Peaking Service					
Xpress Natural Gas LLC	CNG Distribution	1,050	11	11	03/31/2021 (E)
Total		1,050	11	11	
Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)					
Total		413,694	62,320	127,022	

* Any changes from the previous year's report are in bold.

⁽¹⁾ An (E) designates an "Evergreen" contract arrangement.

⁽²⁾ Capacity used to deliver gas to pipelines that deliver to the citygate.



Table 4: Firm Transportation Capacity - Winter 2020-2021

 Company: RG&E
 Submission Date: July 15, 2020
 Version #: 1

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Winter Quantity (MDT)	Annual Quantity (MDT)	Expiration Date ⁽¹⁾
Flowing Gas To Citygate					
Dominion Energy Transmission, Inc. - 100021	FTNN	108,600	16,399	35,787	03/31/2025 (E)
Empire Pipeline, Inc. - F12131	FTNN	117,500	17,743	42,888	3/31/2026
Total		226,100	34,141	78,675	
Upstream Pipeline Support⁽²⁾					
TransCanada PipeLines Limited - 2939	FT	46,929	7,086	17,129	10/31/2022
Total		46,929	7,086	17,129	
Deliveries from Storage					
Dominion Energy Transmission, Inc. - 700018	FTNN, FT	124,000	18,724	18,724	03/31/2025 (E)
Empire Pipeline, Inc. - F12131	FTNN	55,000	8,305	20,075	3/31/2026
Total		179,000	27,029	38,799	
Winter Peaking Service					
Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)					
Total		405,100	61,170	117,474	

* Any changes from the previous year's report are in bold.

⁽¹⁾ An (E) designates an "Evergreen" contract arrangement.

⁽²⁾ Capacity used to deliver gas to pipelines that deliver to the citygate.



b) Table 5

Storage capacity data, including contract volumes and expiration dates. At our meeting, please be prepared to provide the current average price of gas in storage and your forecast for November 1.

Response

See [Table 5](#) for NYSEG and RGE which shows the full contractual obligation for each company.



Table 5: Firm Storage Capacity & Storage Plan – Winter 2020-2021

Company: NYSEG
Submission Date: July 15, 2020
Version #: 1

Storage Company Name	Rate Schedule	Daily Quantity (DT) ⁽¹⁾	Winter Quantity (MDT) ⁽²⁾	Expiration Date ⁽³⁾
Market Area Storage				
Arlington Storage - SL00001S ⁽⁴⁾	FSS	51,000	510	3/31/2021
Columbia Gas Transmission, LLC - 80349	FSS	68,514	4,222	3/31/2025
Dominion Energy Transmission, Inc. - 300063	GSS	110,302	5,922	03/31/2022 (E)
Tennessee Gas Pipeline Company, L.L.C. - 536	FS-MA	9,744	880	10/31/2021
Total		239,560	11,534	
Production Area Storage				
Total		239,560	11,534	

* Any changes from the previous year's report are in bold.

⁽¹⁾ Capacity used to deliver gas to pipelines that deliver to the citygate

⁽²⁾ Winter Quantity = MSQ

⁽³⁾ An (E) designates an "Evergreen" arrangement

⁽⁴⁾ Includes 17,000 dth Upson Road (from Seneca Storage) and remainder is upstream of DTI

Table 5: Firm Storage Capacity & Storage Plan – Winter 2020-2021

Company: RG&E
Submission Date: July 15, 2020
Version #: 1

Storage Company Name	Rate Schedule	Daily Quantity (DT) ⁽¹⁾	Winter Quantity (MDT) ⁽²⁾	Expiration Date ⁽³⁾
Market Area Storage				
Dominion Energy Transmission, Inc. - 300084	GSS	124,000	5,000	03/31/2025 (E)
Empire Pipeline, Inc. - G12130	FSNN	55,000	3,753	03/31/2026 (E)
Total		179,000	8,753	
Production Area Storage				
Total		179,000	8,753	

* Any changes from the previous year's report are in bold.

⁽¹⁾ Capacity used to deliver gas to pipelines that deliver to the citygate

⁽²⁾ Winter Quantity = MSQ

⁽³⁾ An (E) designates an "Evergreen" arrangement



c) Table 6

Gas supply contract data including contract volumes, terms and expiration dates.

Response

Please refer to the next four (4) pages for details related to the 2020-2021 results from the NYSEG and RG&E RFQs issued to suppliers in June 2020. The Baseload auction results are available in the table, however, the Swing Term results from the July RFQ are not yet available and will be provided in the September 2020 update. The quantities, by receipt point, have also been provided by month.





Company: NYSEG
Submission Date: July 15, 2020
Version #: 1

Changes from previous year are highlighted

⁽¹⁾ See page 61 for daily amount by winter month

(2) 100% Swing daily quantity is the maximum

(3) "A for Appalachia, "M" for Marcellus, "C" for Canadian, "G" for Gulf





Company: NYSEG
Submission Date: July 15, 2020
Version #: 1

Case20-M-0189 | 2020-2021 Winter Supply Plan

Table 6: Gas Supply Contracts – Winter 2020-2021

Company: RG&E

Submission Date: July 15, 2020

Version #: 1

Rochester Gas & Electric										
Transporter	Supplier	Receipt Point	AVG Daily Quantity (Dth) ⁽¹⁾	Winter Quantity (MDT)	Annual Quantity (MDT)	Demand (\$/Dth-Month)	Commodity (\$/Dth)	Flexibility ⁽²⁾	Expiration Date	Supply Basin ⁽³⁾
Long Term (>5 years) by FT										
Immediate Term (1 to 5 years) by FT										
Short Term (<1 year) by FT										
Purchases other than by FT										
Total										

Table 6: Gas Supply Contracts – Winter 2020-2021

Monthly Breakdown

Company: RG&E

Submission Date: July 15, 2020

Version #: 1

Rochester Gas & Electric- Monthly Breakdown								
Transporter	Supplier	Receipt Point	NOV (Dth/d)	DEC (Dth/d)	JAN (Dth/d)	FEB (Dth/d)	MAR (Dth/d)	AVG Daily Quantity (Dth)
Short Term (<1 year) by FT								
Purchases other than by FT								
Total								



Data Request 19 – Gas System Flow Diagram

Please provide a flow diagram of the gas system showing how the assets included in Tables 4, 5 and 6 are utilized to provide service to your customers.

Response

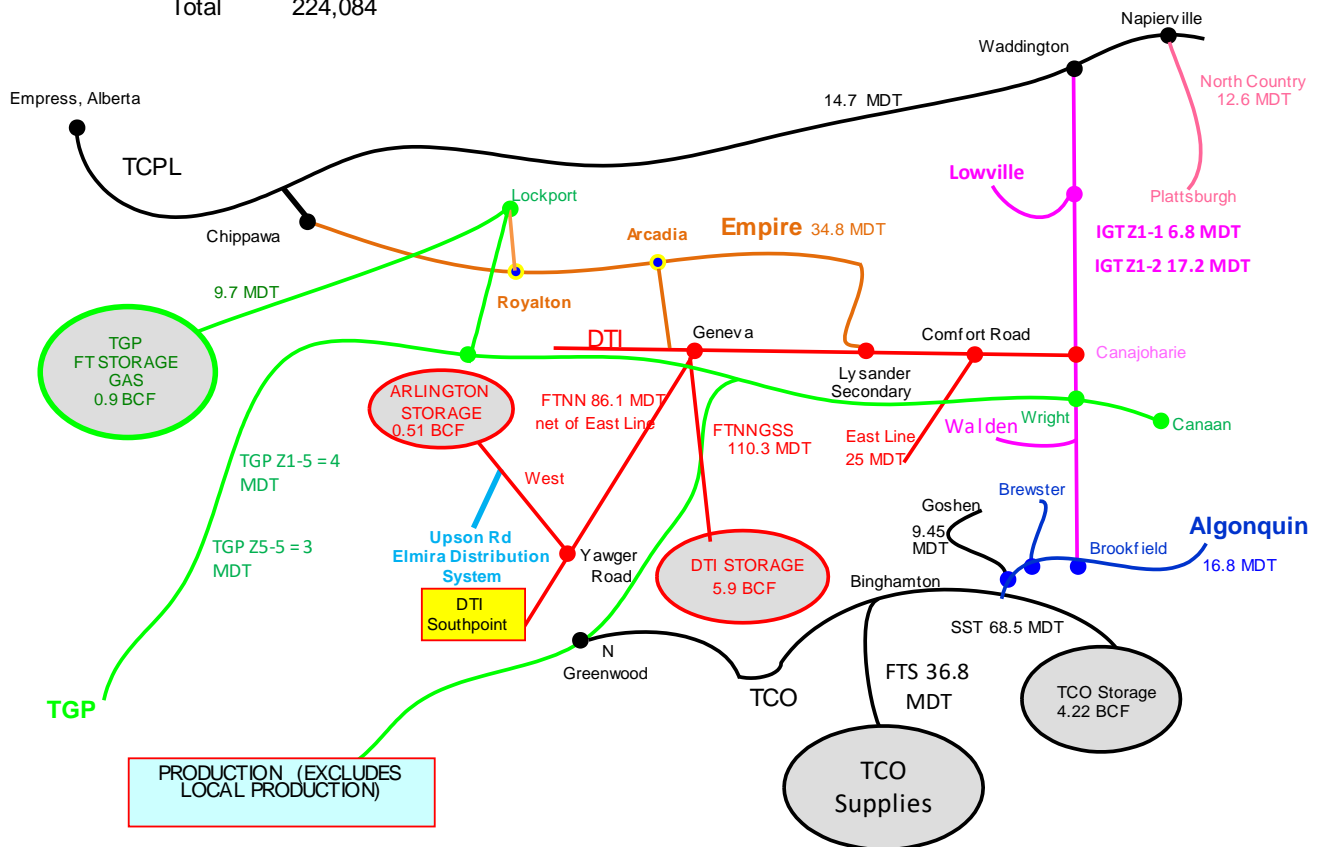
Below are very simplified views of how the various interstate and intrastate pipelines are utilized to serve each of NYSEG's geographically dispersed load centers, as well as RG&E's load center. The figures that follow illustrate the contractual rights in greater detail.



New York State Electric & Gas Pipeline Services and Gas Flows for Winter Peak Day

Effective for Plan Year 2020-2021
Winter Maximum Daily Quantity = 430,694 Dths/day

Pipe	Flowing to CG	Pipe	Storage to CG	Storage to Elmira Distribution System
AGT	16,779	DTI	110,302	17,000 Estimate
DTI	108,140	TGP	9,744	
DTI Mech	3,000	TCO	68,514	CNG Mechanicville Distribution
ESP	34,816	Total	188,560	1,050
IGT	4,865			
NCPL	12,600			
TCO	36,794			
TGP	7,090			
Total	224,084			



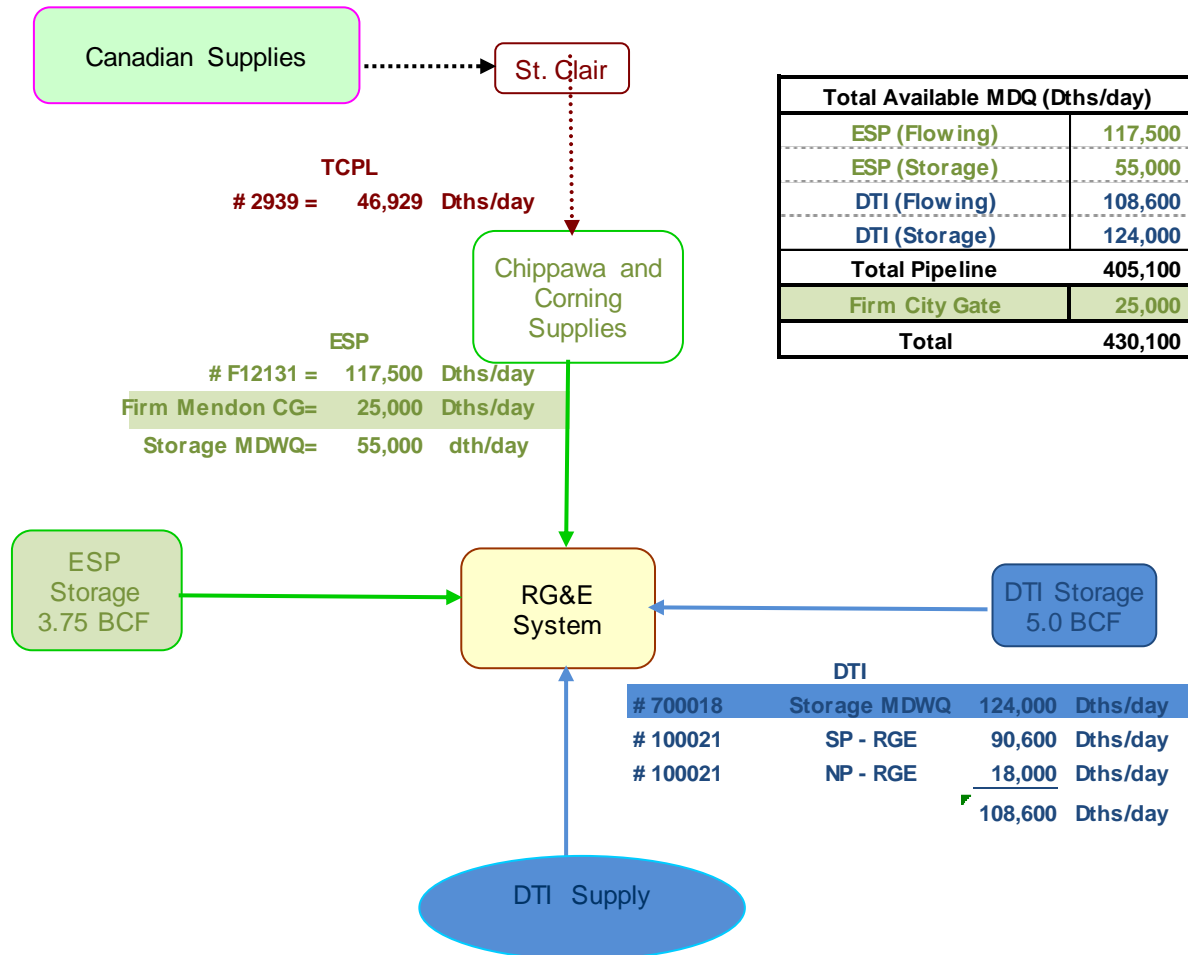
IGT transport capacity is 4,865 dth flowing to citygate and the remaining 12,334 dth is upstream.



Rochester Gas & Electric Corporation

Pipeline Services and Gas Flows for Winter Peak Day

Effective for Plan Year 2020-2021
 Winter Maximum Daily Quantity = 430,100 Dths/day



Data Request 20 – Asset Projects

Are you aware of any pipeline or other capacity asset projects that will or could impact your ability to deliver or supply gas (i.e. NFGS Northern Access, Williams Northeast Supply Enhancement Project, Iroquois ExC, etc.)?

Response

The Companies monitor the progress of pipeline announcements and projects to determine opportunities for system needs. The Companies continue to follow the proceedings for the certification of Enbridge's Atlantic Bridge Project that will add additional capacity to Algonquin Gas Transmission Pipeline. Due to New York's stance on Natural Gas the companies do not anticipate any new pipeline projects. In addition, NYSEG restructured their TCPL long haul capacity from Empress to Napierville in response to the TransCanada Dawn Extension Pipeline Project.

Data Request 21 – Peak Shaving

Describe, if applicable, current practices and any anticipated changes related to on-system peaking facilities and other peak shaving techniques. If you operate LNG peaking facilities, please describe current plans for any activities at the facilities that would interrupt their availability and steps being taken to mitigate those interruptions. Please also list any anticipated permitting issues or resistance from local or other government entities.

Response

NYSEG added on-system peaking service through the use of compressed natural gas ("CNG") for the Mechanicville franchise area. This capability was placed in service during the 2015-16 winter period. As for peak shaving techniques, current practices include the use of each company's respective tariffs, which would include the interruption/curtailment of supply. In NYSEG's current Rate Case filing 19-G-0379, NYSEG has proposed to modify the existing interruptible service offerings, and expand to the entire NYSEG service territory. Neither NYSEG nor RG&E own or operate any LNG peaking facilities.

Data Request 22 – OFOs and Curtailments

A list of the dates, times and durations of all OFOs and interruptions or curtailments on your system during the 2019-2020 heating season. Please differentiate the interruptions and curtailments between electric generator and other interruptible customer class curtailments.

Response

See [Attachment 1: NYSEG and RG&E OFOs, System Alerts, and Curtailments](#).

Neither NYSEG nor RG&E interrupted electric generators served with natural gas during the 2019-2020 winter heating season. NYSEG interrupted seven (7) Interruptible Customers during the 2019-2020 heating season:

Presently, RG&E does not have any interruptible customers.



Data Request 23 – Planning for Interruptible Service Classes

An explanation of how the company determines capacity and peaking supplies required for each of its interruptible service classes, if utilized.

Response

The Companies do not plan for capacity and/or peaking supplies for interruptible service classes.

RG&E's interruptible gas service tariff was effective October 2017. There are currently no customers enrolled under this service class.

Data Request 24 – Long / Short Term Forecasting Process

A description of the long and short-term forecasting process used for gas dispatch purposes. Include all weather services and a description of any in-house software utilized. Please explain how accurate your short-term forecasts were during the 2019-2020 heating season by using a back cast after the actual weather is known.

Response**Long-Term Forecast Process**

Econometric models for each customer class are used for long-term gas forecasting. For residential deliveries a separate econometric model is used to forecast customer counts which are then multiplied by the estimated use per customer forecast. For the non-residential classes (commercial, industrial, municipal) econometric models are used to forecast total deliveries for each customer class. Aggregating the customer class delivery forecasts yields annual total deliveries forecast which is then adjusted for system losses to generate an annual citygate forecast, as described in [Data Request 6](#).

Each day at approximately 6 AM, the process for estimating the various system area load requirements for the next five (5) days begins. NYSEG and RG&E, with its geographically diverse service territories and various approved tariff service offerings, develop load forecasts for several load areas, seven (7) for NYSEG and one (1) for RG&E, across several inter/intrastate pipelines.

NYSEG and RG&E utilize two (2) processes: a vendor-supplied dynamic modeling system (GasDay), and a forecast that is based on a forecast of HDD and a month-based regression analysis for each load area. When forecasting load demand, the Companies develop forecasts that include all end-users; therefore the forecast is on a total load basis.

The primary daily forecasting method, GasDay, is a vendor-supplied software application that delivers customized forecasting models trained on very specific historical data. GasDay provides a daily

forecast (up to 8 days forward) for all but two (2) of NYSEG's and RG&E's operating areas. GasDay contains a powerful set of analytical tools used to evaluate forecasting results and the underlying data that produced them. Additionally, NYSEG and RG&E utilize GasDay's Intraday Forecast option which contains additional datasets and models needed to support multiple forecast periods in a single day.



Lastly, due to the geographically diverse load centers, NYSEG and RG&E utilize the Weather Station Optimization (“WSO”) service to improve forecasting accuracies by using carefully tuned weighted averages of weather forecasts from multiple stations in or near a specific load center. For example, the former methodology to forecast the DTI load center utilized the KBGM weather station. Utilizing the WSO service, by adding the KALB (11.3%), KELM (26.12%), KPEO (36.29%) and KGBM (26.29%) weather stations to the forecasting tool, the analysis indicates that the standard error will improve by 870 Dths as compared to weighting the KBGM station data by 100%.

It is important to evaluate the results of the forecast to ensure that each area load forecast seems reasonable. NYSEG and RG&E also utilize a “Similar Day” in GasDay, which searches through a database to find days that exhibited similar weather characteristics to those used in the aforementioned process. The program displays the actual gas use data from the similar day(s). The intention of the program is to aid the forecaster by allowing them to compare gas load forecast to actual gas use from days with comparable weather.

After the historical and the Similar Days process have been reviewed, the forecaster can make an adjustment to the area load forecast, if necessary. The adjustment could be applied to take into consideration of known customer outages on the system or to better match forecast results to recent load trends.

Weather Forecasting Service

As provided in the response to [Data Request 5](#), the companies utilize AWIS Weather Services, Inc. for its weather data needs.

The accuracy of short-term forecasting models, using perfect weather data for the 2019-2020 heating season, were as follows:

Op Area	MAPE
RG&E Total Load	3.12%
RG&E NDM	3.96%
DTI Total Load	3.06%
TCO Total Load	3.97%
Lockport Total Load	3.64%
NCPL Total Load	4.19%
AGT Total Load	4.83%

Data Request 25 – Management Audit

If your company has had a management audit within the last three years, please list any recommendations from that audit that relate to gas supply procurement, load forecasting, gas price risk management or system planning. Explain whether or not these recommendations have been implemented, and the status of any changes.



Response

Overland Consulting's final management audit report for NYSEG and RG&E was issued by the NYSPSC on February 7, 2019. As it relates to Gas Supply, the final management audit report identified four (4) recommendations:

- 21.1 Assess the Avangrid group level policy Guidelines on Risk Limits to determine if they appropriately address concentration in a single commodity counterparty. Based on study results, consider revising guidelines to better manage risk associated with a single supplier providing over 20% of a specific commodity within the state of New York.
- 21.2 Recommendations in the Natural Gas Portfolio Report, that are intended to contribute towards the optimal portfolio, should contain target implementation dates or be designated as continuous.
- 21.3 Develop performance metrics for supply procurement strategies, policies, processes and methods that support continuous improvement, as two out of the three existing KPIs are based on high level, absolute – achieved or not achieved – goals.
- 22.1 The Companies should prepare a quarterly analysis of gas price volatility with and without hedges.

To date, recommendation 21.2 was implemented in the internal 2018 NYSEG and RG&E Gas Supply Natural Gas Portfolio Report issued on August 31, 2018.

Recommendation 21.3 was implemented through the development of a KPI aimed at tracking the outcome of actual storage injections and withdrawals as compared to planned injections and withdrawals. This monthly report is issued internally and was implemented in September 2019.

Recommendation 22.1 is included quarterly in the Companies' internal AVANGRID Networks Risk Report.

Data Request 26 – Asset Management / Optimization Agreements

A detailed description of any existing asset management or asset optimization agreements, as well as any such agreements being considered or planned. All agreements that include firm capacity and/or supply that are recallable during the winter heating season should be included in [Table 1](#).

Response

The Companies are presently involved in the following asset optimization arrangements.

Canadian Optimization (NYSEG and RG&E)

NYSEG and RG&E executed an optimization agreement which expires October 31, 2020. NYSEG and RG&E release their respective TCPL capacity monthly to the counterparty for a guaranteed annual recovery over a 12-month term.



Both the TCPL and optimization agreements grant first rights (by 8:30 AM each day) on the transportation capacity, and if needed, supply.

NYSEG and RG&E will issue an RFQ to optimize the Canadian assets in the near future.

As with any opportunity, market dynamics are the driving force in determining and valuing any optimization effort. The Companies plan to evaluate opportunities for the non-domestic contract assets, however, the evolution of new pipeline/expansions will undoubtedly change the value and need of such arrangements.

Data Request 27 – Off System Sales / Capacity Release

A description of your company's plans and strategy with respect to off-system sales, capacity release and streaming arrangements for the 2020-2021 winter season as well as any such transactions that extend beyond the 2020-2021 winter.

Response

Both NYSEG and RG&E implement plans and strategies in an attempt to maximize off-system sales, capacity release and other portfolio optimization transactions, as appropriate. Neither company has any streaming arrangements for the 2020-2021 winter season. Both companies engage the services of a third-party to assist in Canadian portfolio optimization as provided in the response to [Data Request 26](#).

The process used in determining what assets are available for off-system sales and capacity release during 2020-2021 will remain similar to previous years. It should be noted, however, as the LDC's contracted asset base changes, the ability to perform off-system sales and capacity release increases or decreases proportionately.

In order to identify assets available for optimization, long-term and short-term plans are prepared and in the process a determination is made concerning what combination of assets is needed to meet system requirements. Based on this determination, NYSEG and RG&E enter into various off-system sales and capacity release transactions. All such transactions are done under terms that ensure each LDC has the necessary rights of recall should system requirements dictate such action.



Data Request 28 – Mandatory Capacity Release / Grandfathered Capacity

Status of mandatory capacity release and grandfathered capacity programs.

- a) **Status of marketer compliance with the Commission’s primary point capacity requirement for grandfathered capacity. Include how much grandfathered capacity remains on your system.**

Response

For NYSEG, an email with an attached affidavit template was sent to each active ESCO on June 23, 2020. The letter was also posted on NYSEG’s Gas Tracking System (“GTS”). The email and GTS posting requested executed affidavits and copies of all price-redacted contracts used for proving/verifying primary point capacity be returned to the Company no later than August 3, 2020.

Additionally, as provided in NYSEG’s NY PSC-approved tariff, if an ESCO wishes to designate a customer as firm secondary rather than to prove primary point capacity, they must do so in writing to the customer and the Company no later than August 3, 2020.

Grandfathered capacity was reviewed in April 2020. The amount of grandfathered capacity on NYSEG’s system is 6,596 Dths (across all pooling areas). This represents no change from last year’s filing.

For RG&E, an email with an attached affidavit template was sent to each active ESCO on June 23, 2020 and was posted on RG&E’s GTS system. The letter requested executed affidavits and copies of all price-redacted contracts used for proving/verifying primary point capacity be returned to the Company no later than August 3, 2020. Additionally, as provided in RG&E’s NY PSC-approved tariff, if an ESCO wishes to designate a customer as firm secondary rather than to prove primary point capacity, they must do so in writing to the customer and the Company no later than August 3, 2020. Furthermore, an ESCO must demonstrate they have firm primary point capacity for the Empire portion of their design day load back to Dawn, or they must prove they have a firm supply contract at Chippawa, or another point downstream of Chippawa.

Grandfathered capacity was reviewed in April 2020; the amount of grandfathered capacity on RG&E’s system is 12,825 Dths. This represents a 2,048 Dth reduction from 2019 volumes reported in last year’s filing.

- b) **Please describe the methodology utilized to determine the mandatory capacity release to the marketers. Indicate how this compares with the methodology utilized to determine capacity required for firm sales customers.**

Response

Capacity requirements and releases are based on the Maximum Daily Aggregated Pool Quantity requirement for the customers in each ESCOs pool for the month at the citygate. The capacity that is released to the ESCO on behalf of non-daily metered customers is based on 66 Heating Degree Days. The capacity released to ESCOs serving daily metered customers that are mandatory capacity release customers is based on 75 Heating Degree Days.



Capacity required for firm sales customers is determined by forecasting the non-daily metered design day by area less the capacity allocated for non-daily metered migrated customers. The capacity allocated for non-daily metered customers is based upon historical demands by each individual customer (base and heat factor determinants).

- c) Please describe how your company keeps marketers informed of changes in procedures. Include the frequency and past/proposed dates of marketer meetings relating to the 2020-2021 heating season.**

Response

NYSEG and RG&E communicate with ESCOs on a frequent basis. Each of the three (3) Lead Analysts in the Supplier Relations Group is assigned a number of ESCOs for whom they are the single point of contact. The Lead Analysts have almost daily contact with ESCOs through email and telephone calls. The Companies send out generic emails to all ESCOs when appropriate, otherwise specific communication is used to contact an ESCO.

Since last year's initial Winter Supply Plan filing, the Companies have hosted one required (1) Gas Marketer Operating Group ("GMOG") meeting, held on October 22, 2019. This meeting was used to discuss winter preparedness, operational updates, and program requirements as outlined in the Gas Transportation Operating Procedures Manual. In response to the Joint Proposal, issued and effective June 15, 2016, the Companies shall convene a GMOG meeting annually in advance of the winter supply period. The Companies will hold any additional meetings on an as-needed basis. A date for the 2020 GMOG meeting will be established in early September 2020.

- d) List the pipelines and allocation percentages being utilized for the mandatory assignment of capacity.**

Response

Please refer to the tables on the next two (2) pages for NYSEG and RG&E's list of pipelines and allocations percentages being utilized for the mandatory capacity release program.



NYSEG Capacity Release Receipt & Delivery Points

Pooling Area	Tariff Rate	Capacity %*	# of Days**	Receipt Meter(s)	Delivery Meter(s)
1 TGP					
Transport (Empire)	FTNN	79%		Corning (22008810)	Royalton (012004010)
Storage Transport	FT-A	21%		N. Storage (460018)	Lockport (420221)
Storage	FS-MA		90		N. Storage (460018)
2 Columbia					
Transport	FTS	35%		Leach (801) @ 100%	Binghamton (21)
				Leach (801) @ 100%	Olean (52)
Storage Transport ***	SST	65%		STOW	Binghamton (21)
Storage	FSS		61.61904		STOW
3 DTI					
Transport	FTNN	53%		Oakford (40208)	20700
Storage Transport ****	FTNNGSS	47%		DTI Storage Pt. (10002)	20700
Storage	GSS		54	DTI Storage Pt. (10001)	DTI Storage Pt. (10002)
4 AGT					
AGT	AFT1/ AFT2	100%		Brookfield (00251)	Southeast (00084)
5 IGT					
IGT	RTS12	100%		Waddington (67707)	Brookfield (68098)
6 NCPL – ESCO Released DTI Capacity					
Transport	FTNN	53%		Oakford (40208)	20700
Storage Transport ****	FTNNGSS	47%		DTI Storage Pt. (10002)	20700
Storage	GSS		54	DTI Storage Pt. (10001)	DTI Storage Pt. (10002)
7 O&R					
No Capacity Released on O&R - NYSEG moves ESCO AGT delivery at Stony Point on NYSEG O&R contract					

* Capacity % is applied to ESCO peak day (75 HDD for daily/66 HDD for non-daily customers)

** Multiply storage transport (MDQ result by the # of days for SCQ (storage capacity quantity))

*** TCO SST MDQ is half of the winter MDQ during April - Sept

**** Not available during the summer (April - October)



**RG&E Capacity Release Receipt & Delivery Points**

Pooling Area	Tariff Rate	Capacity%*	# of Days**	Receipt Meter(s)	Delivery Meter(s)
1 DTI					
Transport	FTNN	22.58%		Oakford (40208)	20600
Transport	FT	4.63%		DTI NP	20600
Transport	FTNNGSS***	28.56%		10002	20600
Storage	GSS		40	DTI Storage Pt. (10001)	10002
2 Empire					
Transport	FTNN	30.13%		Chippawa 12000010	Mendon 120001010
Transport	FTNN	14.10%		Tuscarora	Mendon 120001010
Storage	FSNN		68.238 days	Empire Storage Pt.	Empire Storage Pt.
3 TCPL					
Transport	FT	12.0%		St. Clair	Chippawa

* Capacity % is applied to ESCO peak day (75 HDD daily metered/66 HDD non-daily metered)

** Multiply storage transport MDQ result by the # of days for SCQ (Storage Capacity Quantity)

*** Not available during the summer (Apr-Oct).

- e) Please provide a comparison between your company's weighted average cost of capacity and the charges paid by marketers and direct customers for released capacity. What process, if any, is utilized to true-up any differences?

Response

NYSEG currently releases capacity to ESCOs and Direct Customers based on the Weighted Average Cost of Capacity ("WACOC") as established through the Natural Gas Collaborative (Case 09-G-0716).

NYSEG calculates a WACOC effective each April 1 for the subsequent twelve (12) month period based on the Company's upstream portfolio of capacity assets. If in any month the actual WACOC should differ from the calculated WACOC by more than five percent (5%), the Company will reset the capacity release rate. Furthermore, due to the implementation of the 5% trigger, NYSEG will not reconcile the WACOC charge to ESCOs. NYSEG's WACOC did not differ by more than 5% from the April 1, 2019 filing for the period between April 2019 and March 2020.



Date	WACOC April '19	Actual Cost	Change %
19-Apr	\$9.7855	\$9.7855	0.000%
19-May	\$9.7855	\$9.7768	-0.09%
19-Jun	\$9.7855	\$9.7870	0.02%
19-Jul	\$9.7855	\$9.6640	-1.24%
19-Aug	\$9.7855	\$9.7639	-0.22%
19-Sep	\$9.7855	\$9.7639	-0.22%
19-Oct	\$9.7855	\$9.4386	-3.55%
19-Nov	\$9.7855	\$9.4017	-3.92%
19-Dec	\$9.7855	\$9.3510	-4.44%
20-Jan	\$9.7855	\$9.3510	-4.44%
20-Feb	\$9.7855	\$9.4444	-3.49%
20-Mar	\$9.7855	\$9.4444	-3.49%

At RG&E, the capacity is released to marketers, at maximum pipeline rates, as a slice of its system.

- f) Please describe how your company determines the daily delivery quantities (DDQ) provided to marketers each month for their daily delivery requirements. Provide a sample calculation.

Response

The following formulas are used to calculate the Estimated Total Usage (ETU) for a customer at the citygate:

Winter ETU = [(base usage factor + (winter usage factor *HDD forecast)) * FA]

Summer ETU = [(base usage factor + (summer usage factor *HDD forecast)) * FA]

ETUs are calculated daily based on the current HDD forecast data up to 66 HDDs.

Where:

ETU = Estimated Total Usage

FA = Factor Adjustment

- g) Please indicate if any marketers serving core customers on your system failed to perform as anticipated during the previous winter, and if so, what steps you took to ensure reliability of service.

Response

All ESCOs met their delivery requirements and performed as anticipated during winter 2019-2020.



- h) Please describe any actual storage release or virtual storage programs and indicate the daily volumes associated with each ESCO/marketer and the percent that volume represents of your total daily contracted deliverability from storage.

Response

NYSEG and RG&E release storage to ESCOs on a monthly basis as part of the mandatory capacity release program. NYSEG and RG&E currently do not have any virtual storage programs. Please see the tables below which show storage capacity releases to marketers as a percentage of MSQ.



NYSEG Storage Releases to ESCOs

<u>ESCO</u>	<u>TCO</u>	<u>% MDQ TCO</u>	<u>DTI</u>	<u>% MDQ DTI</u>	<u>TGP</u>	<u>%MDQ TGP</u>
ESCO 1	170	0.25%	317	0.29%	35	0.36%
ESCO 2	35	0.05%	33	0.03%	-	0.00%
ESCO 3	333	0.49%	420	0.38%	77	0.79%
ESCO 4	20	0.03%	21	0.02%	-	0.00%
ESCO 5	10	0.01%	14	0.01%	1	0.01%
ESCO 6	-	0.00%	851	0.77%	-	0.00%
ESCO 7	-	0.00%	-	0.00%	14	0.14%
ESCO 8	2,645	3.86%	4,442	4.03%	153	1.57%
ESCO 9	1,217	1.78%	1,213	1.10%	85	0.87%
ESCO 10	689	1.01%	775	0.70%	-	0.00%
ESCO 11	276	0.40%	250	0.23%	16	0.16%
ESCO 12	6	0.01%	24	0.02%	-	0.00%
ESCO 13	122	0.18%	826	0.75%	224	2.30%
ESCO 14	787	1.15%	716	0.65%	43	0.44%
ESCO 15	92	0.13%	199	0.18%	13	0.13%
ESCO 16	20	0.03%	38	0.03%	-	0.00%
ESCO 17	178	0.26%	382	0.35%	28	0.29%
ESCO 18	43	0.06%	108	0.10%	-	0.00%
ESCO 19	-	0.00%	4	0.00%	-	0.00%
ESCO 20	565	0.82%	552	0.50%	102	1.05%
ESCO 21	98	0.14%	208	0.19%	17	0.17%
ESCO 22	72	0.11%	132	0.12%	19	0.19%
ESCO 23	247	0.36%	904	0.82%	82	0.84%
ESCO 24	-	0.00%	5	0.00%	-	0.00%
ESCO 25	1,785	2.61%	1,656	1.50%	-	0.00%
ESCO 26	531	0.78%	1,351	1.22%	-	0.00%
ESCO 27	131	0.19%	595	0.54%	81	0.83%
ESCO 28	335	0.49%	692	0.63%	66	0.68%
ESCO 29	-	0.00%	504	0.46%	129	1.32%
ESCO 30	20	0.03%	42	0.04%	-	0.00%
ESCO 31	26	0.04%	88	0.08%	-	0.00%
ESCO 32	12	0.02%	48	0.04%	-	0.00%
ESCO 33	42	0.06%	100	0.09%	4	0.04%
ESCO 34	-	0.00%	13	0.01%	-	0.00%
ESCO 35	280	0.41%	377	0.34%	-	0.00%
ESCO 36	213	0.31%	1,259	1.14%	-	0.00%
ESCO 37	-	0.00%	48	0.04%	-	0.00%
ESCO 38	32	0.05%	29	0.03%	5	0.05%
ESCO 39	607	0.89%	1,499	1.36%	3	0.03%
ESCO 40	1	0.00%	85	0.08%	4	0.04%
Total	11,640	16.99%	20,820	18.88%	1,201	12.33%

*Volumes are in Dths

**Volumes reflect June 2020 storage releases



RG&E Storage Releases to ESCOs

ESCO	DTI	% MDQ DTI	ESP	% MDQ ESP
ESCO 1	82	0.07%	40	0.07%
ESCO 2	371	0.30%	183	0.33%
ESCO 3	51	0.04%	25	0.05%
ESCO 4	342	0.28%	169	0.31%
ESCO 5	5	0.00%	3	0.01%
ESCO 6	26	0.02%	13	0.02%
ESCO 7	5	0.00%	2	0.00%
ESCO 8	550	0.44%	272	0.49%
ESCO 9	2,481	2.00%	1,225	2.23%
ESCO 10	1,709	1.38%	844	1.53%
ESCO 11	146	0.12%	72	0.13%
ESCO 12	368	0.30%	182	0.33%
ESCO 13	1,421	1.15%	701	1.27%
ESCO 14	385	0.31%	190	0.35%
ESCO 15	141	0.11%	70	0.13%
ESCO 16	68	0.05%	33	0.06%
ESCO 17	144	0.12%	71	0.13%
ESCO 18	166	0.13%	82	0.15%
ESCO 19	11	0.01%	5	0.01%
ESCO 20	781	0.63%	386	0.70%
ESCO 21	285	0.23%	141	0.26%
ESCO 22	139	0.11%	69	0.13%
ESCO 23	595	0.48%	294	0.53%
ESCO 24	3	0.00%	2	0.00%
ESCO 25	2,296	1.85%	1,134	2.06%
ESCO 26	309	0.25%	153	0.28%
ESCO 27	320	0.26%	158	0.29%
ESCO 28	1,542	1.24%	761	1.38%
ESCO 29	2,571	2.07%	1,270	2.31%
ESCO 30	334	0.27%	165	0.30%
ESCO 31	2,403	1.94%	1,187	2.16%
ESCO 32	44	0.04%	22	0.04%
ESCO 33	293	0.24%	145	0.26%
ESCO 34	37	0.03%	18	0.03%
ESCO 35	16	0.01%	8	0.01%
ESCO 36	200	0.16%	99	0.18%
ESCO 37	366	0.30%	181	0.33%
ESCO 38	83	0.07%	41	0.07%
ESCO 39	4,688	3.78%	2,315	4.21%
ESCO 40	49	0.04%	24	0.04%
ESCO 41	236	0.19%	116	0.21%
Totals	26,062	21.02%	12,871	23.40%

*Volumes are in Dths

**Volumes reflect June 2020 storage releases



Data Request 29 – Alternate Fuel

Description and status of efforts to verify customer alternative fuel availability and equipment testing, including:

- a) **Methods utilized to verify dual-fuel customers' capabilities, including power generation customers.**

Response

For NYSEG, letters are sent in September to all interruptible customers along with a survey requesting information regarding the customer's alternate fuel storage capability and arrangements to replenish or curtail. All interruptible customers are required to complete the survey form and return it no later than mid-October. See [Attachment 2: NYSEG Interruptible Letter and Alternate Fuel Compliance Form 2019-2020](#).

For RG&E, letters are sent in September to all dual fuel customers along with a survey requesting information regarding the customer's alternate fuel storage capability and arrangements to replenish or curtail. See [Attachment 3: RG&E Heating Season Letters and Alternate Fuel Compliance Forms 2019-2020](#).

At RG&E, there are currently no interruptible customers. Should a customer sign up for interruptible service the customer will be required to complete a survey consistent with the current NYSEG policy.

- b) **Please provide the results of compliance with the interruptible rules during last winter. Be sure to include the number of customers switched to firm service or removed from gas service due to non-compliance.**

Response

All 32 of NYSEG's interruptible customers were in compliance during the 2019-2020 winter period. Two customers were removed from being classified as interruptible, as they are limited firm customers taking service under NYSEG's tariff PSC 88 Service Class 7.

RG&E did not have any interruptible customers last winter.

- c) **How many customers will be visited out of how many customers in total? Will all customers with non-compliance issues last winter be visited? How often will the compliant customers be visited?**

Response

For NYSEG, following the return of the surveys, on-site inspections are conducted for all interruptible Human Needs/Critical Care customers, 65% of Goshen and Oneonta area customers, and 30% of all other customers. Thirteen (13) interruptible natural gas customers are not required to have on-site inspections as they are neither Human Needs/Critical Care nor distillate/#2 fuel oil customers. For 2020, approximately 16 of the 32 compliant customers will be visited once, or more, as necessary.



For RG&E, no customers were visited. Information is taken from the surveys returned by the customers. In the event RG&E were to have interruptible customers, on-site inspections would be scheduled in the first year. After the first year, RG&E would follow similar protocols to NYSEG.

d) What are the alternate fuels and how many customers are in each fuel category?

Response

Alternate Fuel Type	Number of Customers NYSEG	Number of Customers RG&E
#2 Fuel Oil	16	13
#4 Fuel Oil	1	0
#6 Fuel Oil	2	3
#2 or #6 Fuel Oil	1	1
Vegetable Oil/Yellow Grease	0	0
Propane	3	0
Wood Chips	3	0
Waste Oil	2	0
Alternate Natural Gas Connection	1	0
No Alternate Fuel – Shut Down	3	1

e) Are affidavits required? What is the status of customer compliance with this requirement at the end of March 2020 and provide the number of outstanding customers that still have not complied with providing the affidavit?

Response

NYSEG and RG&E do not require affidavits.

f) Outcome of review and associated rechecks?

Response

All NYSEG interruptible customers inspected or surveyed were in compliance.

For RG&E, customers were required to have five (5) days alternate fuel on hand by November 1, 2019 in order for the supplier to not need primary point capacity to serve the customer. Suppliers are notified by Gas Supply of any dual fuel customers not meeting the five (5) day on-hand fuel requirement. Should a dual fuel customer at RG&E become an interruptible customer then an inspection would occur.

g) Provide a copy of this year's (if available) and last year's pre-season letter(s), if applicable. Have you made or are you planning to make any changes to these letters based on the events of the 2019-2020 heating season? If yes, what are the changes?



Response

For NYSEG, please see [Attachment 2: NYSEG Interruptible Letter and Alternate Fuel Compliance Form 2019-2020](#). No changes to the letter have been made or are planned based on the events of the 2019-2020 heating season.

For RG&E, please see [Attachment 3: RG&E Heating Season Letters and Alternate Fuel Compliance Forms 2019-2020](#). No changes to the letter for dual fuel customers have been made or are planned based on the events of the 2019-2020 heating season. Should RG&E have an interruptible customer, a letter similar to NYSEG's, as provided in [Attachment 2: NYSEG Interruptible Letter and Alternate Fuel Compliance Form 2019-2020](#), would be sent to the customer.

- h) Did your experience servicing dual fuel customers during last winter indicate the need for additional alternate fuel inventory requirements? If so, what changes do you recommend?**

Response

There were no issues experienced serving NYSEG interruptible or RG&E dual fuel customers that would require additional alternate fuel inventory requirements.

- i) Is the company aware of any issues regarding interruptible customers not receiving their oil deliveries during the winter season? If so, please provide details of when and where this occurred, as well as what the Company would suggest could be done to help these customers?**

Response

NYSEG is not aware of any issues regarding interruptible customers not receiving their oil deliveries during the 2019-2020 winter season.

RG&E did not have interruptible customers during the 2019-2020 winter season.

- j) Will you be modifying your procedures for verifying alternate fuel inventories being held by interruptible customers (including generators and temperature-controlled customers) because of the winter of 2019-2020 experience? If so, how? If affidavits are not used, explain why not?**

Response

No modifications to NYSEG or RG&E procedures are planned as a result of the 2019-2020 heating season. Affidavits are not used because it is not a requirement of the NYSEG or RG&E tariffs. Additionally, we have not experienced problems that would necessitate the use of affidavits.

Data Request 30 – Communication Methods

Describe the methods used to communicate with interruptible customers, their marketers/fuel suppliers, NYSERDA and the various Oil Associations in New York prior to, and during, periods of interruption.



Response

Interruptible customers provide NYSEG with a 24-hour point of contact. If the need to interrupt load is anticipated, the NYSEG account manager would contact customers to provide as much advance notice as possible. In the event NYSEG needs to shed load, customers are contacted by their NYSEG account manager and told how much load to shed and the expected duration of the interruption. During the interruption, the NYSEG account manager keeps in close contact with the customer and advises them as conditions change. Communications to customer marketers/fuel suppliers, NYSERDA, and the various Oil Associations in New York prior to, and during periods of interruption in compliance with Commission Order in Case 11-G-0543 is performed by the Gas Supply Group.

RG&E will follow the same protocols as NYSEG if there is an interruptible customer.

Data Request 31 – Demand Response Planning

Provide a list of all Company, Affiliate or Third Party owned interruptible capable facilities that are not included as part of demand response planning efforts for design day events. Explain in detail why these facilities have been excluded and not part of your company demand response efforts. What is the potential Design Day volumetric savings associated with each of these customers?

Response

Please find a summary below of design day MDQ's for customers on NYSEG and RG&E's systems that are not part of demand response planning efforts for design day events. The identified customers do not take service under an interruptible service class, and although they have alternate fuel capabilities, the account characteristics are such that they are classified as firm customers. In addition to the summary provided in the table below, a detailed list of customers has been provided in [Attachment 5: Non-Interruptible Customers with Alternate Fuel Capabilities](#).

The NYSEG and RG&E Conservation and Load Management group does not currently offer any gas demand response customer programs in New York.

Company	Number of Customers	DTH
NYSEG	96	40,667
RG&E	15	27,047

Data Request 32 – Interruptible Customers

Please provide the total number of firm dual fuel and interruptible customers, by service class, including how many interruptible are temperature controlled. What is the Design Day volumetric savings associated with these customers? How will the switch to their alternate fuel be accomplished and ensured? Please indicate the number of process customers that are exempt from maintaining alternate fuel supplies and have indicated intention to do so and provide a copy of the affidavit to be submitted by those customers. Please provide a copy of the letter that will be sent to all dual fuel customers if there are five or more interruptions prior to February 15, per Commission Order in Case 11-G-0543. For each service class listed, provide



the percent delivery rate savings compared to the delivery rates of the applicable firm service class.

Response

The total number of interruptible and firm dual fuel customers by Company is summarized in the table below. None of these customers are temperature controlled.

Company	Interruptible		Firm Dual Fuel	
	Service Classification	# of Customers	Service Classification	# of Customers
NYSEG	PSC #87; SC 3	6	PSC #88; SC 1	32
	PSC #88; SC 2	26	PSC #88; SC 5	49
			PSC #88; SC 14	9
RG&E	PSC #16, SC15	0	PSC #16; SC 3	15
	PSC #16, SC16	0		

There are two interruptible customers considered process customers who are exempt from the alternate fuel requirement.

The design day volumetric savings associated with 26 NYSEG Interruptible Transportation customers is 123,882 Dth/day. The design day volumetric savings associated with 6 NYSEG Interruptible Sales Service customers is 64,488 Dth/day.

A copy of the letter sent by NYSEG to customers requesting they replenish their fuel oil supplies is provided in [Attachment 4: Replenishment of Oil Storage Inventories](#).

At NYSEG, interruptible delivery prices are set on a monthly basis to compete with the customer's alternate fuel cost. Given the spread between natural gas and other competing fuels, interruptible delivery prices have been set at the otherwise applicable firm transportation delivery rate over the last year, resulting in no savings.

Presently, there are 32 interruptible natural gas customers. Each of these customers takes service under one of the following NYS PSC-approved tariff services: PSC #87 - SC #3 and/or PSC #88 - SC #2. When situations arise to interrupt NYSEG's interruptible natural gas customers, NYSEG Marketing & Sales Department will provide these customers with a minimum two (2) hour notice to curtail/interrupt their natural gas use. Results of the on-site inspections conducted during the Fall of 2019 indicate each of these interruptible customers had demonstrated their ability to utilize their alternate fuel (please see the response to [Data Request 29](#) above).

For the 2019-2020 Winter, there were two (2) process customers that were exempt from maintaining alternate fuel supplies and have signed the compliance form indicating so. The requested compliance form to be submitted by process customers that are exempt from maintaining alternate fuel supplies is a part of the attached Alternate Fuel Compliance Form (please see [Attachment 2: NYSEG Interruptible Letter and Alternate Fuel Compliance Form 2019-2020](#)).



For the 2019-2020 winter, two (2) NYSEG customers were interrupted five (5) or more days prior to February 15, 2020. Fuel storage replenishment letters were sent per Commission Order in Case 11-G-0543. The letter sent to dual fuel customers, should the five (5) or more interruption threshold be met prior to February 15th, is provided in [Attachment 4: Replenishment of Oil Storage Inventories](#).

As previously mentioned, RG&E does not have interruptible customers. RG&E will follow the same protocols as NYSEG if a customer signs up for interruptible service.

Data Request 33 – Organization Chart

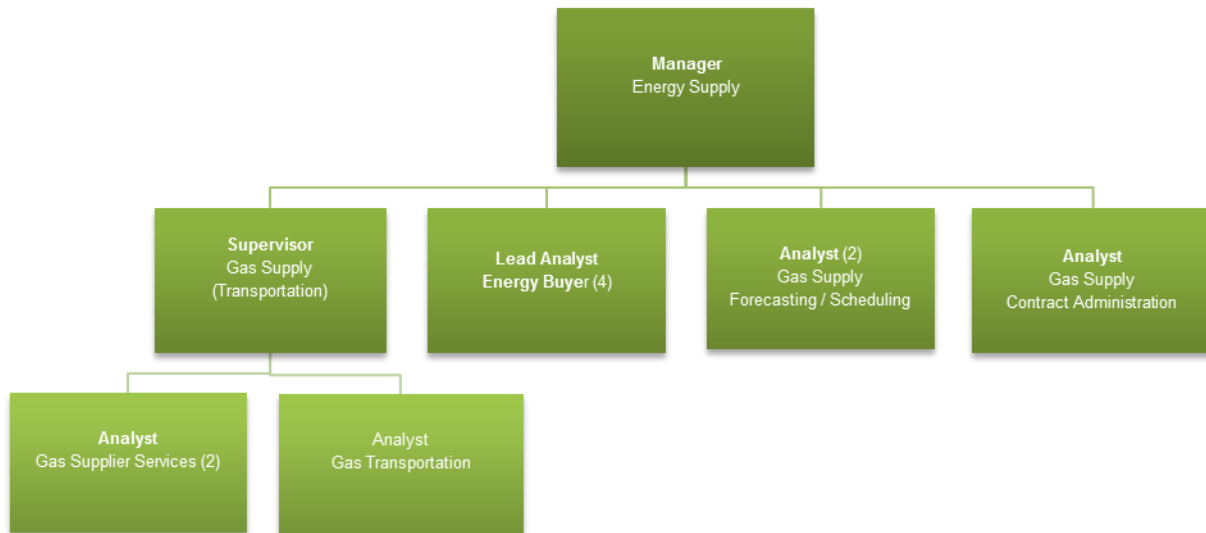
A current organization chart for your company's gas supply department. Please include a list of contact people for the winter season for updated storage, peaking and other supply-related information. Include the chief dispatcher and telephone numbers for both weekdays and weekends.

Response

Please see below to view a current organizational chart and department contact information.



Organization Chart – Gas Supply Department As of July 15, 2020



Contact Information for 2020-21 Winter Season for NYSEG and RG&E

Gas Supply – NYSEG and RG&E			
Contact	Title	Office Phone	Cell Phone
Jackie Casciani	Manager	585.484.6620	607.422.7293
Marcella Hightower	Supervisor	585.484.6545	607.422.1206
Gas Control – NYSEG and RG&E			
Contact	Title	Office Phone	Cell Phone
Sue Dornblaser	Manager	585.484.4701	607.760.3918
Louis Armstrong	Supervisor	607.762.4209	607.242.4523
Gas Control – NYSEG and RG&E Weekends / After Hours and Emergencies			
Contact			Cell Phone
Gas Control Desk - 24 Hour Coverage		607.762.4209	N/A

Data Request 34 – Natural Gas Conversions

Please provide the following information on conversions to natural gas:

- a) Requests received per year, for the last five years, from customers using heating fuels other than natural gas. Provide the data broken down between residential and non-residential customers. If there has been an increase in requests, how is the company handling such an increase?

Response

During the period from January 1, 2015 through May 31, 2020 the following requests were received by customers wanting to switch from another heating fuel to natural gas. At NYSEG, the 2020 requests through May are significantly lower than in 2019. At RG&E, 2020 requests through May are comparable to the same period in 2019.

Year	NYSEG		RG&E	
	RES	NON-RES	RES	NON-RES
2015	1,311	118	304	37
2016	739	99	221	21
2017	712	75	204	8
2018	843	87	273	27
2019	714	71	195	20
2020 (through May 31)	197	20	70	3



- b) Do you see new opportunities to expand gas services, regardless of the ever-changing cost differential between natural gas and its alternatives? If so, please explain any plans and the expected number of customer conversions.

Response

NYSEG is not actively promoting natural gas expansion projects and is not offering incentives for the conversion to natural gas from alternative fuels in 2020. There is one gas expansion project that was started by NYSEG for the Town of Maine using the Community Development Fund pilot program approved by the PSC as part of Case 15-G-0284. When this project is completed, NYSEG may connect approximately 110 customers in the Town of Maine.

At RG&E most opportunities to expand natural gas are for new or expanding residential sub-divisions.

- c) Identify any areas within your service territory where you have placed a moratorium on the addition of new customers, new service or any restrictions on existing services. Describe the reasons why such a restriction is necessary. Whether or not a moratorium was implemented, but new customers are not being added due to supply reasons, indicate the modeled peak design day pressure associated for each area. Provide the design standard or minimum required peak design day pressure needed to lift the restriction on adding customers.

Response

The only formal moratorium is in NYSEG's franchise in the Town of Lansing, Tompkins County. The design day peak hour pressure is predicted to be 7 pounds per square inch (psig) at the northern terminus of NYSEG's 60 psig maximum allowable operating pressure (MAOP) distribution system. The design day is a 75 heating degree day (HDD). 22 psig was recorded on January 31, 2019, which was a 64 HDD. The moratorium is necessary to prevent additional load growth from further reducing system pressures. At the current predicted pressures, the service regulators are at risk to have insufficient pressure for proper operation. NYSEG would consider removing the moratorium if the endpoint pressure is restored to a level closer to 70% of MAOP, 42 psig. An ongoing capital project (NYS Route 34 Reinforcement Loop) is expected to be completed during 2020 and is expected to boost design day terminal pressures by about 15 psig.

NYSEG and RG&E do not have formal moratoriums in the towns of Oneonta, Goshen, and Avon. However, gas supply to these areas is limited by supply from the upstream pipelines. Pressures on the NYSEG and RG&E distribution systems are currently above 50% of MAOP in these towns.

Oneonta and Avon are served by Dominion Energy Transmission, Inc. (DETI). DETI's capacity is fully and /or nearly fully subscribed in these areas. Therefore, new gas load for new industrial customers (typical of Industrial Development Agency (IDA) requests) cannot be met due to the supply constraints. ESCO's may have sufficient Primary Point Capacity to serve new customers as Daily Metered Customers.

NYSEG's Oneonta system low point end pressure equals 33 psig (60 psig MAOP). Oneonta is served from the DeRuyter pipeline. DeRuyter is a 300 psig MAOP system that operates at 240 psig on the design day peak hour with the compressor at Norwich operating and interruptible customers off.

RG&E's Avon low point end pressure is 46 psig (60 psig MAOP).



DETI's unsubscribed capacity as posted on their Electronic Bulletin Board indicates that DETI has no unsubscribed capacity available at NYSEG's 20700 receipt point or at RG&E's 20600 receipt point.

Pursuant to the Commission's March 2020 Order, a complete analysis of the locations in the Companies' service territories known to be vulnerable to supply constraints can be found in New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation's Supply and Demand Analysis Related to Service Areas with Known Supply Constraint Vulnerabilities in Case 20-G-0131, which will be filed by July 17, 2020

d) Please provide a list of Title V air permit holders in your service territory (available on the DEC website) and indicate whether there is currently natural gas service to each.

Response

Please see below for a list of Title V air permit holders as listed on the DEC website in NYSEG and RG&E service territories:

NYSEG Service Territory		
Title V Air Permit Holders: NYSEG Service Territory		
Permit Holder	Location	Natural Gas Service
Anchor Glass Container Corp	Elmira	Yes
Auburn Sanitary Landfill No 2	Auburn	Yes
Borger Station	Dryden	Yes
Broome County Landfill	Binghamton	No
Broome County LFG Recovery Facility	Binghamton	No
Buckeye Pipe Line Co	Auburn	No
Cayuga Operating Company, LLC	Ithaca	No
Cornell University Main Campus	Ithaca	Yes – direct pipeline connection
DuPont Specialty Products USA, LLC	Tonawanda	Yes
Neenah Northeast (Fibermark)	Lowville	Yes
Guardian Industries Corp	Geneva	Yes
Gunlocke Co	Wayland	Yes
Huron Campus	Endicott	Yes
Kennedy Valve Div. McWane, Inc.	Elmira	Yes
Kerry	Norwich	Yes
Lockport Cogeneration Facility	Lockport	Yes – direct pipeline connection
Lyonsdale Biomass LLC	Lyons Falls	No
Mill Services, Inc.	Cobleskill	Yes
Nucor Steel Auburn Inc.	Auburn	Yes
Ontario County Landfill	Seneca	Yes
Owens Brockway Glass Container Inc.	Auburn	Yes
Pactiv LLC	Canandaigua	Yes
Pactiv Technology Center	Canandaigua	Yes
Pall Trinity Micro	Cortland	Yes
Pliant LLC (DBA Berry Plastics Corp)	Macedon	Yes
Saint Gobain Adfors America Inc.	Albion	Yes
Saranac Power Partners Co-Generation Fac.	Plattsburgh	No
Seneca Energy LFGTE Facility	Seneca Fall	No
Seneca Meadows SWMF	Waterloo	No
Silgan Containers Corp	Lyons	Yes
US Salt – Watkins Glen Refinery	Watkins Glen	Yes - direct pipeline connection
Vandemark Chemical Inc.	Lockport	Yes



RG&E Service Territory

Title V Air Permit Holders: RG&E Service Territory		
Permit Holder	Location	Natural Gas Service
American Packaging Corp	Rochester	Yes
Buckeye Rochester South Terminal	Rochester	Yes
Carestream Health At Eastman Bus Pk	Rochester	Yes
Eastman Business Park	Rochester	Yes
Hammer Packaging Corp	Rochester	Yes
Mill Seat Landfill	Rochester	Yes
Red-Rochester LLC At Eastman	Rochester	Yes
Rochester Silver Works	Rochester	Yes
Semiconductor Components Industries LLC (Truesense Imaging)	Rochester	Yes
Sunoco Partners M & T Roch Terminal	Rochester	Yes

- e) If you serve customers in the New York City area, describe your analysis and the impacts to your system of the city's anticipated proposal to require larger buildings to convert from heavy fuel oils (#4 and #6) to lighter oil (#2 and bio-fuels) and/or natural gas for space heating.

Response

NYSEG and RG&E do not serve customers in the New York City area.

- f) Please provide a list of natural gas distribution system expansion projects, including new franchise opportunities, which are being pursued in the next five years.

Response

NYSEG and RG&E are pursuing a limited number of natural gas main extension projects, which are summarized below. Neither NYSEG nor RG&E is investigating new franchise opportunities at this time.

NYSEG Project Name	Division	Interested Customers	Other Potential Customers	Footage
Town of Maine	Binghamton	111	48	13,642
Colesville Road – Binghamton	Binghamton	1	1	200
Day Road – Lockport	Lockport	1	0	200
RG&E Project Name	Division	Interested Customers	Other Potential Customers	Footage
Panorama Park – Penfield	Rochester	3	0	2,579
Panorama Trail – Penfield	Rochester	1	1	690
Whole Foods – Brighton	Rochester	1	4	363
Fairport Nine Mile Point Road - Penfield	Rochester	1	3	810
Ridge Road – Clarkson	Rochester	15	12	1,325
Birchwood Drive – Perry	Rochester	1	0	160
Fairmont Street – Mount Morris	Rochester	1	0	140



- g) Please provide a 3-year forecast of all projects advancing REV clean energy/demand response natural gas solutions.

Response

NYSEG and RG&E are in the process of developing a procedure to identify additional NPA opportunities that could include REV clean energy/demand response natural gas as NPA solutions. At this time the Companies do not have a forecast.

- h) Please identify any potential use of renewable gas resources, or demand response program proposals that may address capacity or pressure constrained service areas, that could be utilized to reduce peak day demand and alleviate the need for additional interstate pipeline capacity or gas distribution network upgrades.

Response

At this time there are no renewable gas resources, geothermal, or solar programs at NYSEG or RG&E that will impact our peak day demand. The recently filed Joint Proposal includes a proposal to conduct a feasibility study associated with deploying geothermal district energy systems.

- i) Please identify any potential use of RNG, CNG or LNG as an NPA to alleviate the need for additional interstate pipeline capacity or gas distribution network upgrades.

Response

NYSEG currently has a CNG peaking facility installed in the Mechanicville Division to provide gas pressure and capacity during peak periods.

NYSEG was asked by local government officials to opine on options, including CNG, as an alternative to serve additional load in the Oneonta area.

NYSEG received several proposals in response to the Lansing Non-Pipelines Alternative Request for Proposal (RFP), which included RNG, CNG, and LNG proposed solutions.

RG&E currently has no active NPA opportunities.

- j) Please provide any analysis your company has done to date regarding how CLCPA will impact your design day, design winter or annual natural gas demand.

Response

Given the early stages of the design and implementation of CLCPA, no adjustments were made to this forecast. The potential impact of this program is being closely monitored, and when meaningful data becomes available, forecast adjustments will be made.



Data Request 35 – CNG or LNG below Flood Level

Are there any locations comprising CNG or LNG facilities or citygate stations that lie below either the 100- or 500-year flood level? If so, please identify them and provide the date of the last time the location was flooded. Also, please identify if the company has planned and/or designed any projects that would reduce the risk from flooding at any CNG or LNG facility or citygate.

Response

The following NYSEG CNG and/or gate stations are located within the 100-year flood zone:

- [REDACTED] there is no record of this station flooding.
- [REDACTED] there is no record of this station flooding.

The following NYSEG CNG and/or gate stations are located between the 100-year and 500-year flood zone:

- [REDACTED] there is no record of this station flooding.
- [REDACTED] there is no record of this station flooding.

There are no RG&E Gate Stations within the 100- or 500-year flood zone. RG&E does not have any CNG stations. NYSEG and RG&E do not have any LNG stations.

Issue 4 (Data Requests 36-39)

Please provide the following information related to your company's plans to diversify purchases and manage gas price risk:

Data Request 36 – Gas Purchasing Strategy

A description of your company's gas purchasing strategy, including:

- Information regarding gas purchases for last year and any planned changes for this year. Did your experience during the winter of 2019-2020 lead to any changes? If so, what are the changes? If not, why not? Please include an identification of the amount of Canadian, domestic gas (identify shale gas purchases if available) RNG and CNG/LNG purchased.

Response

Neither Company procures RNG or LNG for system needs at this time. The Mechanicville area uses CNG as a winter peaking service. In 2019 NYSEG purchased 1,192 dth of CNG.

In calendar year 2019, Marcellus purchases comprised over 87% of the total NYSEG gas supply, slightly down from 89% in 2018. Canadian purchases comprised just over 10% of the total NYSEG gas supply, up from 9% in 2018. The remaining gas purchases are a combination of Gulf supplies, market area purchases and local production. RG&E purchases of Marcellus gas comprised 97% of RG&E's gas supply in 2019, up from 94% in 2018. Canadian gas during 2019 was approximately 3% of the total gas supply, down from 6% in 2018.



Neither NYSEG nor RG&E changed their gas purchasing strategies based on the winter of 2019-2020. Both companies met all storage obligations. Baseload and swing contracts were in place and utilized according to the contracted transportation capacity of each company's portfolio.

b) The types of contracts and associated contract flexibility.

Response

Winter term contracts for baseload and swing supplies are entered into annually. Winter 2020-2021 supply arrangements and their character of service are located in [Table 6](#) of [Data Request 18.c](#).

c) Information regarding how the utility protects against credit risk of its suppliers.

Response

There is essentially no direct credit risk from the suppliers as we are purchasing and have to pay them. The risk of concern would be if a supplier failed to meet its contractual obligation as we would have to replace supply at market price. We protect against this in three ways. First, by monitoring the creditworthiness of the counterparties with which we have contracts to make sure they have been consistently performing before we agree to purchase large quantities from them for the winter period. Second, we may establish limits to ensure the contracted winter amount does not exceed a value we are confident the counterparty can fulfill. And, third, we may require credit support instruments, or collateral, to ensure any financial loss is covered.

d) The extent of planned reliance on firm gas, spot gas, swing gas, etc.

Response

System supply gas is baseloaded on a monthly basis to cover minimum day requirements. Swing gas is purchased to cover forecasted daily demand fluctuations. Storage gas constitutes 44% of NYSEG's and 30% of RG&E's winter demand requirements.

e) The description of any triggers to purchase spot (daily) gas.

Response

ICE is checked daily to compare market price compared to winter swing term deals. Lower pricing is a trigger to purchase spot gas. Significant next day weather changes would also cause a spot purchase.

f) Pricing terms, indices, etc. of the contracts.

Response

Baseload supplies are purchased utilizing the NYMEX settle price and a locked-in physical basis amount or a monthly index price. Swing supplies are often tied to Gas Daily indices, although they can also be at a fixed price.

g) The liquid point(s) that you typically purchase at.



Response

Dominion South and North Point, Corning, Columbia Gas Appalachia Pool, Chippawa, TGP 500 Leg, TGP Zn 4 200 Leg, TCPL Dawn, IGT Receipt (Waddington), and TGP Northern Storage point.

- h) **The effects that recent and proposed pipeline projects and new supply sources of gas have had on your current (and long-term) purchasing strategy. Include the breakdown of the volumes of gas purchased for the 2019-2020 winter and projected for the 2020-2021 winter purchases from the Northeast (Marcellus/Utica), mid-continent, Gulf and Canadian supply regions.**

Response

The development of Marcellus Shale gas has reduced the basis prices back to Henry Hub well below traditional levels from DTI North and South Point. REX Pipeline has become a receipt point for Marcellus gas for east to west deliveries. Lebanon and Clarrington, which once traded below DTI South Point, now trade at a premium to this Marcellus-centered trading location. Flow reversals of Marcellus gas into Canada have all but eliminated the Niagara import pricing location. Likewise, Empire Pipeline gas, which was primarily Canadian sourced, is now sourced from the Corning/Pennsylvania Marcellus region. In the near-term, the impact has kept downward pressure on commodity pricing allowing for a more liquid, less volatile commodity market. Furthermore, gas supplies are flowing on different paths, to and from points unheard of before. Producers are filling pipelines at a very fast rate, which is causing some pipelines to demand that gas be brought onto their system from other, less desirable, supply points.

However, from a long-term perspective, the impact is not as clear. This is primarily due to the supply-demand relationship and how that balance is impacted from various pipeline proposals or other decisions. Many proposed Northeast projects and pipelines are designed to take gas away from the Marcellus and Utica Basins. These pipeline projects have potential to increase the commodity price on gas in the area. These proposed projects will be monitored as to the effect they may have on pricing and the companies' portfolios.

The following table provides a percentage breakdown of actual purchased supplies by supply location for the winter of 2019-2020 and a forecast for the winter of 2020-2021.

Supply Location	NYSEG		RG&E	
	2019-2020 Actual	2020-2021 Forecast	2019-2020 Actual	2020-2021 Forecast
Canadian	2.01%	3%	1.83%	5%
Gulf	.19%	1%	0%	0%
Local Production	.30%	1%	0%	0%
Marcellus	97.50%	95%	98.17%	95%
Mid	0%	0%	0%	0%

- i) **Strategy for using storage assets going forward in light of Marcellus area production, since what was once market area may now be considered production area.**



Response

NYSEG and RG&E continue to utilize storage assets as a means to levelize our gas purchases throughout the year and mitigate potential price spikes during winter high demand periods.

- j) **Any analysis of your use of long-haul capacity versus short haul and/or local production going forward, including any contracts recently or planned to be converted from long-haul to short-haul.**

Response

NYSEG and RG&E continuously evaluate the value of transitioning the portfolio for each company with less long-haul related transportation services to a portfolio with more short-haul related transportation services. In 2019 NYSEG removed Columbia Gulf long haul capacity from its portfolio.

The use of local production sources in place of long-haul or short-haul capacity still poses a reliability concern, both from a supply perspective as well as a supply diversity perspective. Gas quality issues as well as consistent production levels continue to be challenging from time to time.

Data Request 37 – Gas Price Risk – [Table 7](#)

A description of your company’s gas price risk management strategy, including answers to the following questions:

- a) **What percentage of your gas supply do you hedge (1) physically and (2) financially?**

Response

Both NYSEG and RG&E hedge between 50% and 60% of their projected winter requirements. For NYSEG, approximately 42.7% of the projected winter season throughput is in storage on November 1. For RG&E, approximately 29.7% of the projected winter season throughput is in storage on November 1.

- b) **Please break this down between storage and fixed price contracts.**

Response

Storage withdrawals are considered physical hedges for winter supply.

- c) **If you use fixed price contracts, how, when and in what increments are they purchased?**

Response

Neither NYSEG nor RG&E currently enter into fixed price physical contracts for a period greater than one month.

- d) **Please provide the breakdown between futures and options (include quantities of each type on an annual and winter season basis).**



Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility. NYSEG has a quantity of 2,420 MDT financial futures for the winter season. RG&E has a quantity of 5,250 MDT financial futures for the winter season.

e) How do you finance your swap/futures? Do you pay for them at the time of purchase or delivery?

Response

NYMEX and swap agreement (contract for difference) contracts are “financed” through cash and/or letters of credit, where required (to cover maintenance margin and mark-to-market valuations). NYMEX HH purchases are financially settled where the Floating Price for each contract month will be equal to the NYMEX Henry Hub Natural Gas Futures contract final settlement price for the corresponding contract month on the last trading day for that contract month. Bilateral agreements are typically invoiced on business day 10 following the date of the monthly settlement.

f) What types of options do you use?

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

g) Describe how you decide which types of options to use.

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

h) How much and what percentage of total gas costs, booked to the GAC, do you spend on options?

Response

Neither NYSEG nor RG&E currently enter into financial options to hedge volatility.

i) How far out, when, and in what increments do you purchase futures?

Response

For any given month’s hedging requirement, both NYSEG and RG&E purchase 75% of the contracts 12 months in advance and 25% of the contracts 16 months in advance.

j) How has your hedging strategy changed in the past year? Did your experience during the winter of 2019-2020 lead to any changes? If so, what are the changes? If not, why not?

Response

Neither NYSEG nor RG&E have made changes to their hedging strategies in the past year.



k) Describe any lessons learned in the past year.

Response

Due to the inability to “time and beat the market”, reducing potential upside price exposure through a sound structured hedging strategy is the best way to mitigate volatility.

l) Do you calculate gas price volatility, if so how, where and what time period do you use?

Response

NYSEG and RG&E have a conservative hedging strategy designed specifically to address price volatility. The goal is to mitigate the risk of volatility on behalf of customers. As participants in the wholesale markets, NYSEG and RG&E are very aware of on-going price changes, but do not currently calculate volatility.

m) How do you determine the success or failure of your hedging program?

Response

NYSEG and RG&E regularly monitor the hedging program to ensure that its fundamental goals are met; these goals are established in a) and i) above.

n) Please provide internal reporting, oversight, and audit structure of your hedging program.

Response

Both NYSEG and RG&E’s Gas hedging practices are governed by the following:

- Energy Supply Risk Management Procedures Manual
- Avangrid Derivatives Policy
- Avangrid Accounting Policy Reference Manual
- FAS 133

Audits of the Gas Supply Department’s adherence to the controls contained in the above documents are conducted at least once a year by internal and/or external auditors. In addition, weekly commodity meetings are held to review the current gas market. Monthly meetings are held by the Energy Services Risk Management Oversight Committee to discuss current gas supply issues.

o) **Table 7**

Actual price hedging and supply performance versus planned price hedging and supply performance for last year, a summary of “lessons learned”, and arrangements for this year. Include separate quantities for each hedging instrument.

Response

The NYSEG and RG&E hedging program is structured to mitigate price volatility, not managed to specific price performance. Each Company considers pricing information for the winter plan 2020-2021 to be Trade Secret; therefore, certain data in Tables 7 (NYSEG) and 7 (RG&E) is being provided under Trade Secret Protection. Table 7 is found on the next two (2) pages.



Table 7: Winter Supply Hedges Summary

 Company: NYSEG
 Submission Date: July 15, 2020
 Version #: 1

New York State Electric & Gas: Winter 2019 – 2020 Purchasing Plan & Projected			
Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
	Market Area Storage*		
	Production Area Storage		
	Fixed Price Contracts		
	Financial Hedges		
	NYMEX Futures		
	Collars		
	Calls		
	Puts		
	Flowing or Floating Price Gas		
	Monthly Index		
	Spot/Daily Price		
	TOTAL		

New York State Electric & Gas: Winter 2019 – 2020 ACTUAL Purchasing & Prices			
Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
	Market Area Storage*		
	Production Area Storage		
	Fixed Price Contracts		
	Financial Hedges		
	NYMEX Futures		
	Collars		
	Calls		
	Puts		
	Flowing or Floating Price Gas		
	Monthly Index		
	Spot/Daily Price		
	TOTAL		

New York State Electric & Gas: Winter 2020 – 2021 Purchasing Plan & Projected			
Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
	Market Area Storage*		
	Production Area Storage		
	Fixed Price Contracts		
	Financial Hedges		
	NYMEX Futures		
	Collars		
	Calls		
	Puts		
	Flowing or Floating Price Gas		
	Monthly Index		
	Spot/Daily Price		
	TOTAL		

*Market Area Storage WACOG estimated value based on NY MEX on 6/30/2020



Table 7: Winter Supply Hedges Summary

Company: RG&E
Submission Date: July 15, 2020
Version #: 1

Rochester Gas & Electric: Winter 2019 – 2020 Purchasing Plan & Projected Prices			
Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
	Market Area Storage*		
	Production Area Storage		
	Fixed Price Contracts		
	Financial Hedges		
	NYMEX Futures		
	Collars		
	Calls		
	Puts		
	Flowing or Floating Price Gas		
	Monthly Index		
	Spot/Daily Price		
	TOTAL		
Rochester Gas & Electric: Winter 2019 – 2020 ACTUAL Purchasing & Prices			
Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
	Market Area Storage*		
	Production Area Storage		
	Fixed Price Contracts		
	Financial Hedges		
	NYMEX Futures		
	Collars		
	Calls		
	Puts		
	Flowing or Floating Price Gas		
	Monthly Index		
	Spot/Daily Price		
	TOTAL		
Rochester Gas & Electric: Winter 2020 – 2021 Purchasing Plan & Projected Prices			
Percent Hedged Normal Weather	Portfolio Summary	Amount (MDT)	Price Commodity
	Physical Hedges		
	Market Area Storage*		
	Production Area Storage		
	Fixed Price Contracts		
	Financial Hedges		
	NYMEX Futures		
	Collars		
	Calls		
	Puts		
	Flowing or Floating Price Gas		
	Monthly Index		
	Spot/Daily Price		
	TOTAL		

*Market Area Storage WA COG estimated value based on NYMEX on 6/30/2020



Data Request 38 – Local Production / Landfill

How has your use of local production/landfill/renewable gas changed over the past year? Please provide the average daily volumes of local produced gas acquired for the previous heating season and a forecast for the upcoming season. Also, include any plans to connect new or additional local production to your distribution systems. What percentage of your system throughput is local production? Include the total volume of locally produced gas that entered your system annually since 2008 until the present. How much of this gas is directly tied into your distribution system?

Response

Since supply in any given load pocket cannot be considered reliable, NYSEG and RG&E will contract to purchase local production volumes on an interruptible basis.

NYSEG's average daily purchase for the 2019-2020 heating season was 601 Dths/day, up from the previous heating season of 533 Dths/day.

RG&E's average daily purchase for the 2019-2020 heating season was 0 Dths/day, which is the same as the previous season.

On an annual basis, NYSEG's and RG&E's purchases as a percentage of total system demand are as follows:

Calendar Year	NYSEG (in Dths)			RG&E (in Dths)		
	Local	Total	Percent	Local	Total	Percent
2008	2,885,313	56,919,046	5.07%	81,244	51,556,139	0.16%
2009	3,521,659	57,621,449	6.11%	36,620	50,016,066	0.07%
2010	3,501,564	52,422,442	6.68%	33,830	48,119,708	0.07%
2011	3,976,911	53,664,417	7.41%	32,263	48,815,534	0.07%
2012	2,959,993	51,161,522	5.79%	30,731	45,097,455	0.07%
2013	3,601,418	56,115,710	6.42%	28,841	51,698,913	0.06%
2014	3,133,600	59,727,509	5.25%	24,377	54,362,158	0.04%
2015	1,957,891	56,598,127	3.46%	18,761	51,656,546	0.04%
2016	1,260,277	54,053,143	2.33%	16,610	49,455,063	0.03%
2017	641,783	55,169,904	1.16%	0	52,191,020	0.00%
2018	316,582	57,831,313	0.55%	0	60,855,969	0.00%
2019	244,193	57,646,442	0.42%	0	60,994,991	0.00%

For the upcoming heating season, NYSEG has only one Local production supplier to purchase from which is directly tied to an LDC, and RG&E has no local production being purchased for system supply. There are no known additional local production interconnects that have progressed beyond the discussion stages at this time.



Data Request 39 – Renewable Natural Gas (RNG)

Identify when and how standards for connecting Renewable Natural Gas (RNG) projects will be filed with the Commission. If there are no plans to file RNG standards, please explain why.

Response

NYSEG and RG&E do not anticipate formally filing notification to the Commission in regard to the connection of Renewable Natural Gas (RNG) facilities. Filings related to construction and testing will be in accordance with NYS Part 255 and Company Standards.

Issue 5 (Data Requests 40-44)

Please provide the following information related to the changing market conditions:

Data Request 40 – Convergence of the Gas and Electric Markets

A discussion of the impacts of the convergence of the gas and electric markets in your company's service territory, including:

a) Increase in summer load from last year.

Response

NYSEG anticipates no changes to summer load due to generation. RG&E is seeing increasing summer load from an existing daily metered customer which has converted from coal to natural gas for their generation capabilities.

b) Change in winter load due to increased electric generation.

Response

Neither Company has added demand for natural gas to serve electric generation since the previously filed 2019-2020 Winter Supply Plan.

c) Changes in system operations from last year including how gas-fired electric generators' needs and behavior during last winter impacted your distribution system operations.

Response

The Companies have not identified any issues related to system operations. Many of the generators currently connected to the NYSEG and RG&E distribution system are smaller in nature and do not impact distribution system operations.

At this time, the Companies have not identified any changes or significant issues related to convergence of the electric and natural gas markets.

d) List any inquiries that have been made to you for natural gas service by electric generators that you were not able to fulfill.



Response

Since the last Gas Supply Plan filing, there have been no requests for natural gas service by electric generators on the distribution network.

e) Need for distribution system facilities improvements.

Response

NYSEG and RG&E have not identified a need for distribution system improvements for electric generation.

f) Available information on generators' upstream capacity arrangements.

Response

Neither NYSEG nor RG&E have any information on any generator's upstream capacity arrangements. Typically, a generator aligns itself with a market participant that manages significant assets for its customer base.

g) Relationship between your company and its electric, steam operations or affiliate-owned generation, including any peaking service agreements.

Response

Neither Company owns any gas-fired generation and therefore is not involved with electric or steam operations related to gas-fired generation. Additionally, neither Company has any contractual relationship with affiliated-owned generation.

h) Distributed Generation/CHP, including any micro-grid applications, and their impact on peak design-day forecasting. List all known planned projects and locations on the system.

Response

As provided in previous Winter Gas Supply Plan filings, the Companies are not aware of any significant issues related to gas-electric market convergence or any effects on system reliability that is not already addressed for:

- Gas markets, through the various interstate pipeline alerts/notices, and
- Electric markets, through the New York Independent System Operator's ("NYISO") guide titled ["NYISO Expectations of Generator Operation During a Gas Restriction or Interruption"](#).

As it relates to Distributed Generation ("DG") and Combined Heat and Power ("CHP") projects, the Companies note that the overall growth in DG has been substantially from photovoltaic projects and that NYSERDA is the service provider for the programs that offer customers incentives for CHP projects. The project queue as of June 12, 2020 for open CHP projects at NYSEG and/or RG&E is as follows:



Customer Name	Utility	Nameplate Rating (kW)	Application Received
Customer 1	RG&ENYSEG	35	2/17/2015
Customer 2	NYSEG	4.2	10/28/2019

- i) Provide a list of all electric generators in your service territory and indicate whether or not they are currently attached to your distribution system. If so, indicate the maximum daily delivery quantity of the generating station.

Please see [Attachment 7: Electric Generators in NYSEG and RG&E Service Territory](#), which lists gas fired electric generators in NYSEG and RG&E's service territories.

- j) Outline typical communications between gas-fired generators in your service territory and your natural gas control center, and explain any improvements planned for those communications.

Response

Many of the generators currently connected to the NYSEG and RG&E distribution system are smaller in nature and do not impact system operations. Therefore, there is little communication between the Gas Control Center and these smaller connected generators.

Data Request 41 – Other Projects

Please discuss any other major projects that will affect your purchasing strategy over the next five years and your anticipated responses to these changes.

Response

The development of Marcellus and Utica shale supplies and the desire to get those supplies to market has had and will continue to have an impact to how commodity is purchased, at least for the next two (2) to four (4) years. The oversupply situation in the northeast will potentially begin to resolve itself as projects to move shale gas to other markets are built, bringing a tighter balance to the supply-demand mismatch. While many takeaway pipeline projects and LNG terminals have been approved outside of New York State or are in the process of being approved, there should still be sufficient supplies in the area for the upcoming years. The Companies' will monitor these projects as they continue to be built. Commodity pricing may increase on the Marcellus and Utica gas due to the takeaway project, but the companies will continue to monitor best cost gas to serve their customers. We do not anticipate many new pipeline projects or expansions due to New York's stance on Natural Gas, but the Companies' will continue to monitor any new projects.



Data Request 42 – Natural Gas Vehicles

Currently, how much natural gas is being sold on an annual basis for use in natural gas vehicles? How has this changed over the past few years and how do you anticipate that this will change over the five-year planning period in your service territory?

Response

NYSEG currently delivers natural gas to two (2) CNG fueling stations using 80,969 Dth per year. Total CNG usage since the last report has decreased approximately 4%.

RG&E currently delivers natural gas to seven (7) CNG fueling stations using 175,447 Dth per year. Total CNG usage since the last report has increased approximately 7%.

Over the past few years all of the NYS DOT CNG fuel stations within NYSEG and RG&E service territories have closed. The last new CNG fueling station to come on line was in 2015 at NYSEG and 2016 at RG&E. It is anticipated that there will be minimal changes in natural gas used for vehicles over the next five years.

Data Request 43 – CNG / LNG

Have you been approached by or had any discussions with outside entities regarding the construction of compressed natural gas (CNG) or liquefied natural gas (LNG) fueling stations? If so, please explain. What impediments do you see for the expansion of CNG and LNG transportation?

Response

NYSEG and RG&E have not recently been approached by or had discussions with outside entities regarding the construction of compressed natural gas fueling stations. Currently NYSEG and RG&E provide natural gas delivery service to nine CNG fueling stations which are owned and operated by outside entities.

Potential impediments for the expansion of CNG transportation in NYSEG and RG&E service areas include the following:

- Adequate pressure and/or capacity availability on the natural gas distribution system to serve a fueling station at a particular location
- The lower driving range of CNG vehicles compared to gasoline/diesel vehicles.
- The cost associated with construction of CNG fueling stations.
- A high number of low mileage fleets that can't justify the cost of converting to CNG.



Data Request 44 – Pipeline Projects

Please list potential pipeline projects you are interested in, identifying the pipeline, delivery point, and daily delivery quantity you might take. Provide a list of all pipelines that you are communicating with on a regular basis regarding expansion projects on their pipeline systems that might be filed with the Federal Energy Regulatory Commission.

Response

The Companies monitor the progress of pipeline announcements and projects to determine opportunities for system needs, including previously announced expansions on Empire Pipeline, DETI, TCO, TGP and the Enbridge Atlantic Bridge Project. Both NYSEG and RG&E regularly communicate with the intra- and interstate pipelines serving its service territory. Other than the aforementioned projects, neither NYSEG nor RG&E are aware of any additional expansions.

Issue 6 (Data Request 45)

Please provide the following information regarding bill impacts:

Data Request 45 – Billing Comparisons -Table 8

Bill impact comparison of last winter (2019-2020) versus the forecasted 2020-2021 winter. Include the work papers used to develop Table 8 (note: they should also tie to the numbers in [Table 7](#)).

Response

Please see Tables 8.1 and 8.2, on the next two (2) pages, which represent NYSEG's and RG&E's bill comparisons.



**Table 8.1: Bill Comparison (Excluding Taxes)
Winter 2019-2020 to Winter 2020-2021**

Company: NYSEG
Submission Date: July 15, 2020
Version #: 1

1	2	3	4	5	6
NYSEG	2019-20 Average Residential Heating Customer Winter Bill	2019-20 Average Residential Heating Customer Winter Bill	2020-21 Forecasted Residential Heating Customer Winter Bill	Commodity Related Percent Change from Last Winter	Expected Percent Change from Last Winter
	Actual	Normalized	Normalized	(column 4 - column 3) / column 3	(column 4 - column 2) / column 2
Total Delivery Costs	\$330	\$336	\$330	-1.7%	0.0%
Total Capacity Costs	\$71	\$74	\$77	4.5%	8.2%
GAC Costs (Commodity)	\$140	\$144	\$144	0%	3%
¹ GAC Reconciliation	-\$7	-\$7	-\$3	-57%	-55%
² GAC Surcharges and Refunds	\$13	\$14	\$14	1%	4%
Total Commodity Costs	\$146	\$151	\$155	2.7%	6.0%
Total Winter Bill	\$548	\$561	\$563	0.3%	2.7%

Assumptions:

Normal = 935 Therms/year with 705 Therms of winter use

Last Year = 679 Therms of winter use

Notes:

- ¹ Identify the impact of any GAC reconciliation surcharge or refund mechanism.
2019/2020 Annual Reconciliation of Gas Cost (\$0.018494)/therm
2020/2021 No estimate at this time
- ² Identify the impact of any other surcharges or refunds included in bills.
- Merchant Function Charge (MFC) average rate \$.019741/therm (Winter 2019/20 \$.019526)
- Heater Fuel average rate \$.000220/therm (Winter 2019/20 \$.000318)
- System Performance Adjustment average rate (\$.000108)/therm (Winter 2019/20 (\$.000094))

Make up of Monthly Bill Impact - 2020-2021 Winter

1 Delivery	55.73%
2 GRT	2.16%
3 Gas Cost Factor	38.83%
4 Transition Surcharge	0.50%
5 Systems Benefits Charge	0.21%
6 Merchant Function Charge	2.48%
7 Revenue Decoupling Mechanism (RDM)	0.09%
8 Temporary NY State Surcharge	0.00%
9 Other	0.00%
	100.00%



**Table 8.2: Bill Comparison (Excluding Taxes)
Winter 2019-2020 to Winter 2020-2021**

Company: RG&E
Submission Date: July 15, 2020
Version #: 1

1	2	3	4	5	6
RG&E	2019-20 Average Residential Heating Customer Winter Bill	2019-20 Average Residential Heating Customer Winter Bill	2020-21 Forecasted Residential Heating Customer Winter Bill	Commodity Related Percent Change from Last Winter	Expected Percent Change from Last Winter
	Actual	Normalized	Normalized	(column 4 - column 3) / column 3	(column 4 - column 2) / column 2
Total Delivery Costs	\$281	\$288	\$289	0%	2.6%
Total Capacity Costs	\$67	\$69	\$76	10%	14%
GAC Costs (Commodity)	\$155	\$159	\$151	-5%	-3%
¹ GAC Reconciliation	-\$8	-\$9	-\$4	-55%	-51%
² GAC Surcharges and Refunds	\$9	\$9	\$12	34%	38%
Total Commodity Costs	\$155	\$160	\$159	-1%	2%
Total Winter Bill	\$503	\$516	\$523	1%	4%

Assumptions:

Normal = 930 Therms/year with 700 Therms of winter use

Last Year = 676 Therms of winter use

Notes:

¹ Identify the impact of any GAC reconciliation surcharge or refund mechanism. 2019/2020 annual rec -\$0.016674/therm ,SPA charge \$.000409/therm. The annual reconciliation for 2020/2021 (no estimate at this time.)

² Identify the impact of any other surcharges or refunds included in bills. (Heater Fuel, R&D, Interdepartmental sales, Transp. Revenues refund) 2019-2020 -\$0.005515; 2020-2021 -\$0.005154

Make up of Monthly Bill Impact - 2020-2021 Winter

1 Delivery	53.46%
2 GRT	1.53%
3 Monthly Rate (GAC) Adjustment	41.60%
4 Gas Cost Factor	0.00%
5 Systems Benefits Charge	0.03%
6 Merchant Function Charge	2.98%
7 Revenue Decoupling Mechanism (RDM)	0.41%
8 Temporary NY State Surcharge	0.00%
9 Other	0.00%
	100.00%



**Attachment 1: NYSEG & RG&E OFOs, System Alerts and Curtailments
Response to Data Request 22**

**New York State Electric and Gas Winter 2020-2021
System Alerts, OFOs and Customer Interruptions**

Type of Notice	Effective Date	Effective Time	Date Lifted	Time Lifted	Pipeline
SA	10/31/2019	9:00 AM	2/7/2020	10:00 AM	DTI
SA	11/1/2019	10:00 AM	11/12/2019	10:00 AM	TGP
SA	12/19/2019	10:00 AM	1/9/2020	10:00 AM	TCO Transport
SA	12/23/2019	10:00 AM	1/9/2020	10:00 AM	TGP
SA	12/28/2019	10:00 AM	12/31/2019	10:00 AM	IGT
SA	1/9/2020	10:00 AM	1/10/2020	10:00 AM	TGP - downstream of 245
SA	1/10/2020	10:00 AM	1/16/2020	10:00 AM	AGT
SA	1/10/2020	10:00 AM	1/17/2020	10:00 AM	TGP
SA	1/18/2020	10:00 AM	2/8/2020	10:00 AM	TCO
SA	1/24/2020	10:00 AM	2/8/2020	10:00 AM	AGT
SA	1/29/2020	10:00 AM	2/8/2020	10:00 AM	TCO
SA	2/7/2020	10:00 AM	2/10/2020	3:00 PM	DTI
SA	2/7/2020	10:00 AM	2/10/2020	10:00 AM	AGT
SA	2/10/2020	10:00 AM	2/13/2020	10:00 AM	AGT
SA	2/14/2020	10:00 AM	2/16/2020	10:00 AM	DTI
SA	2/16/2020	10:00 AM	2/22/2020	10:00 AM	TGP
SA	2/18/2020	10:00 AM	2/27/2020	10:00 AM	TCO
SA	2/22/2020	10:00 AM	2/29/2020	10:00 AM	TGP
SA	2/27/2020	10:00 AM	3/31/2020	10:00 AM	TCO
SA	2/26/2020	10:00 AM	2/28/2020	10:00 AM	MPC O&R
SA	3/2/2020	10:00 AM	3/13/2020	10:00 AM	TGP
SA	3/10/2020	2:00 PM	4/6/2020	10:00 AM	MPC O&R
SA	3/11/2020	10:00 AM	3/21/2020	10:00 AM	AGT
SA	3/20/2020	11:00 AM	3/21/2020	10:00 AM	AGT
SA	3/21/2020	10:00 AM	3/24/2020	10:00 AM	AGT
SA	3/24/2020	10:00 AM	3/27/2020	12:00 PM	AGT
SA	3/27/2020	12:00 PM	3/28/2020	10:00 AM	AGT
OFO	11/8/2019	10:00 AM	1/10/2020	10:00 AM	AGT
OFO	11/13/2019	10:00 AM	11/15/2019	10:00 AM	TGP - downstream of 245
OFO	11/12/2019	18:00	11/14/2019	10:00 AM	IGT
OFO	11/12/2019	10:00 PM	11/14/2019	10:00 AM	IGT
OFO	12/7/2019	10:00 AM	12/9/2019	10:00 AM	TGP - downstream of 245
OFO	12/12/2019	10:00 AM	12/13/2019	10:00 AM	TGP
OFO	12/17/2019	2:30 PM	12/23/2019	10:00 AM	IGT
OFO	12/18/2019	10:00 AM	12/21/2019	10:00 AM	TGP
OFO	12/21/2019	10:00 AM	12/23/2019	10:00 AM	TGP - downstream of 245
OFO	1/11/2020	10:00 AM	1/13/2020	10:00 AM	IGT
OFO	1/17/2020	10:00 AM	1/22/2020	10:00 AM	TGP - downstream of 245
OFO	1/16/2020	10:00 AM	1/24/2020	10:00 AM	AGT
OFO	1/17/2020	10:00 AM	1/23/2020	10:00 AM	TCO Transport



New York State Electric and Gas Winter 2020-2021

Type of Notice	Effective Date	Effective Time	Date Lifted	Time Lifted	Pipeline
OFO	1/17/2020	10:00 AM	1/23/2020	10:00 AM	IGT
OFO	1/30/2020	10:00 AM	2/1/2020	10:00 AM	MPC O&R
OFO	1/30/2020	10:00 AM	2/1/2020	10:00 AM	TCO Transport
OFO	2/8/2020	10:00 AM	2/10/2020	10:00 AM	AGT
OFO	2/8/2020	10:00 AM	2/24/2020	3:00 PM	MPC O&R
OFO	2/8/2020	10:00 AM	2/24/2020	3:00 PM	TCO Transport
OFO	2/13/2020	10:00 AM	2/18/2020	8:00 AM	AGT
OFO	2/14/2020	10:00 AM	2/15/2020	10:00 AM	TCO Storage
OFO	2/14/2020	10:00 AM	2/15/2020	10:00 AM	TCO Transport
OFO	2/14/2020	10:00 AM	2/16/2020	10:00 AM	TGP
OFO	2/14/2020	10:00 AM	2/17/2020	10:00 AM	IGT
OFO	2/19/2020	10:00 AM	2/22/2020	10:00 AM	AGT
OFO	2/20/2020	10:00 AM	2/22/2020	10:00 AM	TGP - downstream of 245
OFO	2/27/2020	10:00 AM	3/2/2020	10:00 AM	AGT
OFO	2/28/2020	10:00 AM	3/2/2020	3:00 PM	TCO Transport
OFO	2/28/2020	10:00 AM	3/2/2020	3:00 PM	MPC O&R
OFO	2/29/2020	10:00 AM	3/2/2020	10:00 AM	TGP - downstream of 245
OFO	3/13/2020	10:00 AM			TGP
OFO	3/28/2020	10:00 AM	4/13/2020	10:00 AM	AGT
CI	12/18/2019	11:00 PM	12/19/2019	11:00 AM	Customer 7
CI	12/18/2019	11:00 PM	12/19/2019	11:00 AM	Customer 5
CI	12/18/2019	11:00 PM	12/19/2019	11:00 AM	Customer 3
CI	12/19/2019	11:00 PM	12/20/2019	11:00 AM	Customer 7
CI	12/19/2019	11:00 PM	12/20/2019	11:00 AM	Customer 5
CI	12/19/2019	11:00 PM	12/20/2019	11:00 AM	Customer 3
CI	12/20/2019	11:00 PM	12/21/2019	11:00 AM	Customer 7
CI	12/20/2019	11:00 PM	12/21/2019	11:00 AM	Customer 5
CI	1/20/2020	1:00 AM	1/20/2020	9:00 PM	Customer 7
CI	1/17/2020	8:00 PM	1/18/2020	11:00 AM	Customer 7
CI	1/17/2020	8:00 PM	1/18/2020	11:00 AM	Customer 5
CI	1/20/2020	1:00 AM	1/20/2020	12:00 PM	Customer 7
CI	1/20/2020	9:00 PM	1/21/2020	12:00 PM	Customer 7
CI	1/22/2020	12:00 AM	1/22/2020	12:00 PM	Customer 7
CI	2/14/2020	5:00 PM	2/15/2020	12:00 PM	Customer 5, Customer 3, Customer 1, Customer 2, Customer 4, Customer 6
CI	2/14/2020	5:00 PM	2/15/2020	1:00 PM	Customer 7
CI	2/20/2020	11:00 PM	2/21/2020	11:00 AM	Customer 7

Rochester Electric and Gas Winter 2020-2021 System Alerts, OFOs and Customer Interruptions

Type of Notice	Effective Date	Effective Time	Date Lifted	Time Lifted	Pipeline
SA	10/31/2019	9:00 AM	2/7/2020	10:00 AM	DTI
SA	2/7/2020	10:00 AM	2/10/2020	3:00 PM	DTI
SA	2/14/2020	10:00 AM	2/16/2020	10:00 AM	DTI

CI = Customer Interruption

OFO = Operational Flow Order

SA = System Alert



Attachment 2: NYSEG Interruptible Letter and Alternate Fuel Compliance Form 2019-2020
Response to Data Request 29a, 29g and 32

September xx, 2019

Re: Interruptible Service Requirements for the 2019/2020 Heating Season

Dear xxxxxxxx:

NYSEG is required to make an annual assessment of the emergency interruption capability of our interruptible rate natural gas customers. This requirement was established in 2000, and applies to all interruptible rate gas customers for utilities across the state. More information regarding the Public Service Commission (PSC) requirements and NYSEG's tariffs may be found at the PSC website: www.dps.state.ny.us.

The assessment is required of all interruptible rate gas customers who use Distillate Fuel (No. 2 oil, diesel, or kerosene) as their alternate fuel, and all customers who are considered "human needs" customers (those who house people, such as hospitals, prisons, and colleges with dormitories), regardless of their alternate fuel. The requirements do not apply to non-human needs customers who use other sources for their alternate fuel (for example, No. 4 oil, No. 6 oil, propane or coal). The PSC, through NYSEG has established specific requirements for alternate fuel capability, to ensure the ability of interruptible customers to interrupt, should the need arise. The requirements are summarized below:

- Those customers who use Distillate Fuel as described above must show sufficient storage of fuel for the coming heating season. This requirement can be fulfilled in one of the following ways:
 - 1) **Onsite storage sufficient for ten (10) days of possible interruption. As a guide, the PSC suggests the customer consider the average of the last 3 years' use when determining requirements for a 10-day supply.**
 - 2) **If a 10-day supply is not available onsite, the customer must show that the onsite storage is full at the beginning of the heating season and arrangements not dependent on spot market purchases are in place for replenishment of storage tanks during an interruption. The on-site storage and replenishment arrangements must equal at least ten days' use during a possible period of interruption.**
 - 3) **As an alternative to filling onsite storage, a customer may elect to shut down operations "for the duration of the critical period." It must be stressed that this option requires a willingness to be shut down for an indefinite period of time, and as many times as interruptions may be imposed during the heating season.**
- If a customer fails to maintain the required level of oil storage and replenishment arrangements, the gas utility is required to charge a 30% price premium for the period which covers the time the customer is known by the gas utility to be out of compliance with the order. This means that the customer will be billed the greater of 130% of the cost of the applicable gas equivalent alternate fuel price or one hundred thirty percent of the otherwise applicable sales gas price less an estimate of the Customer's natural gas price, as determined by the Company.
- Compliance with the fuel oil requirement at the beginning of the heating season does not insure continued compliance. If the alternate fuel supply is used during periods of non-interruption, the customer will need to replenish the fuel up to the minimum levels.



- Natural gas utilities are required to inspect a representative group of customers to ensure that proper storage levels are on hand or that replenishment arrangements are in place, and that dual fuel equipment is operable.

Compliance with the terms of your interruptible natural gas service requires that you complete the attached survey form and return it no later than October 11, 2019. Please return the survey form via facsimile at (xxx) xxx-xxxx; electronically at xxxxxxx@nyseg.com, or mail at:

XXXXXXXXX
Key Account Manager
New York State Electric & Gas Corporation
150 Erie Street
Lancaster, NY 14086

In addition, you will receive a site visit from me if you are a "human needs" customer. If you have No. 2 distillate fuel as your alternative fuel and you are not a human needs customer, you may or may not receive a site visit to confirm the results of the survey.

You may wish to consult NYSEG's Gas Tracking System for historic usage information, available at <https://iusa.gastrackingsystem.com>. Should you have any questions, please do not hesitate to call me at (xxx) xxx-xxxx.

Sincerely,
Xxxx XXXXXXXX
Key Account Manager
Enclosure



Please Reply by October 11, 2019

NYSEG Interruptible Gas Service Customer Alternate Fuel Compliance Form

Company Name: _____

Address: _____

Name/Title of person completing this form: _____

Telephone Number: _____

Date form completed: _____

1. Is your facility a "human needs" concern that houses people (such as a hospital, prison, or college with dormitories)? Yes _____ No _____
2. Does your firm use distillate fuels (#2 oil, kerosene, or diesel) as a backup if natural gas delivery is interrupted? Yes _____ No _____

Please continue with the rest of the survey ONLY if you answered YES to either or both questions 1 and 2.

If you answered NO to both questions, please sign here: _____

Methods of Compliance: The Public Service Commission (PSC) has determined interruptible rate customers can comply with the requirements of the order in one of the following three ways. Please select the best option for your company and complete the questions, which apply to the method of compliance, which you have chosen.

- 1) Onsite storage sufficient for ten (10) days of possible interruption. As a guide, the PSC suggests the customer consider the average of the last 3 years' use when determining requirements for a ten-day supply. - **Please complete the following Part A only.**
- 2) Onsite storage full at the beginning of the heating season and arrangements not dependent on spot market purchases are in place for replenishment of storage tanks during an interruption - this method may be used if a 10-day supply is not available onsite. The on-site storage and replenishment arrangements must equal at least ten days' use during a possible period of interruption. **Please complete the following Part B only.**
- 3) Curtailed of those operations that normally use gas, rather than switching to a distillate fuel, if natural gas supplies are interrupted. We acknowledge that this option could require an indefinite number and duration of shutdown periods, because interruption periods are not easily forecasted. **Please complete the following Part C only.**

If you need assistance in obtaining historic use information, please utilize the NYSEG Gas Tracking System at <https://iusa.gastrackingsystem.com>, or contact your NYSEG Account Representative.



Part A: - Complete this part for the full 10-day storage capacity option.

1. Number of gallons of oil storage tank capacity _____
2. Number of gallons of oil you plan to have on hand by 11/1/2019 _____
3. Number of therms of natural gas you could use in a 10 day period of interruption (use the most representative 10-day period for your operations.) _____
4. Equivalent number of gallons of oil used in a 10 day period
 - For #2 oil divide the # of therms of gas from #3 by 1.39 _____
 - For #4 oil divide the # of therms of gas from #3 by 1.45 _____
 - For #6 oil divide # of therms of gas from #3 by 1.50 _____
 - Other _____
5. # of days supply represented by total tank capacity (the # reported in question 1, divided by the # of gallons used in a 10 day period from question 4, multiplied by 10) _____
6. # of days supply represented by planned 11/1/2019 inventory level (the # reported in question 2, divided by the # from question 4, multiplied by 10) _____
7. You may use a viable substitute alternate fuel to provide part of the 10-day storage inventory. If you plan to use an alternate fuel (non-distillate fuel, i.e. #6, wood, coal) as part of the inventory, please provide a description of that fuel storage inventory and calculations to support the remainder of the 10-day storage inventory.

Signed: _____

Part B: - Complete this part if your tank storage capacity is less than the required 10-day supply.

1. Number of gallons of oil storage tank capacity _____
2. Number of gallons of oil you plan to have on hand by 11/1/2019 _____
3. Number of therms of natural gas you could use in a 10 day period of interruption (use the most representative 10-day period for your operations.) _____
4. Equivalent number of gallons of oil used in a 10-day period
 - For #2 oil divide the # of therms of gas from #3 by 1.39 _____
 - For #4 oil divide the # of therms of gas from #3 by 1.45 _____
 - For #6 oil divide # of therms of gas from #3 by 1.50 _____
 - Other _____
5. # of days supply represented by total tank capacity (the # reported in question 1, divided by the # of gallons used in a 10 day period from question 4, multiplied by 10) _____





July 15, 2020

6. # of days supply represented by planned 11/1/2019 inventory level (the # reported in question 2, divided by the # from question 4, multiplied by 10) _____
7. You may use a viable substitute alternate fuel to provide part of the 10-day storage inventory. If you plan to use an alternate fuel (non-distillate fuel, i.e. #6, wood, coal) as part of the inventory, please provide a description of that fuel storage inventory and calculations to support the remainder of the 10-day storage inventory.
8. Since a 10-day storage inventory is not an option, you must have arrangements to replenish your supply during an interruption. Please describe your arrangements and attach copies of any relevant documents.

Signed: _____

Part C: - Complete this part if your compliance option is shutting down alternate fuel operations.

1. Rather than obtain a 10-day supply of alternate fuel, we plan to comply with this order by curtailing alternate fuel operations during any and all periods of interruption in the 2019/2020 heating season. We acknowledge that this option could require an indefinite number and duration of shutdown periods, because interruption periods are not easily forecasted.

Signed: _____





July 15, 2020

Attachment 3: RG&E Heating Season Letters and Alternate Fuel Compliance Forms 2019-2020

Response to Data Request 29a and 29g

Sent Via E-mail

RG&E natural gas transportation customers that have an alternate fuel supply are required to demonstrate to us that they have alternate fuel capabilities to meet their peak day usage requirements. If a facility is out of compliance your natural gas supplier will be required to secure firm primary point capacity on the interstate pipeline to meet your peak day natural gas requirements.

The RG&E tariff requires that you have five days alternate fuel supply on site effective November 1st each year and that your alternate fuel system is operational.

Attached are the annual dual fuel compliance form(s) that must be completed and returned no later than **June 18, 2019**. Please send the completed compliance form(s) to GasMarketing@rge.com. Upon receipt of the certification we will verify your compliance and notify you and your supplier if your facility is out of compliance. If you do not return the completed compliance form your facility will be considered out of compliance.

If you have any questions about this requirement or the compliance form, please contact me.



RG&E Alternate Fuel System Compliance Form

Natural gas customers served under Service Classification No. 3 with alternate fuel capability are required to demonstrate to RG&E that they have alternate fuel capability to meet their peak day needs if their supplier does not have primary point capacity to serve them on a firm basis. The alternate fuel system and supply must be capable of handling an extended outage for a period of at least five days. It is the Customer's responsibility to provide annual proof or certification that the equipment has been tested and the planned fuel supply that will be on site as of November 1, 2019. These requirements also apply to Service Classification No. 7 accounts with annual use greater than or equal to 35,000 therms.

Please complete this form no later than June 18, 2019 and return it via e-mail to GasMarketing@rge.com.

Account No: xxxxxxxxxxxx

Business Name: xxxxxxxxxxxx

Service Address: xxxxxxxxxxxx

Type of Alternate Fuel:	
Alternate fuel inventory currently on site (gallons):	
Alternate fuel inventory planned to be on site as of 11/01/2019 (gallons):	
Number of therms of natural gas you could use in a 5 day period of interruption during a peak winter period?	
Do you test your alternate fuel system and do you plan for it to be operational on 11/01/2019?	

Based on the information provided, we will determine if this facility will meet the compliance requirements as of November 1, 2019. We will notify you if this facility does not meet the compliance requirements.

I attest to accuracy of the information provided above and understand the obligation to maintain an operational alternate fuel system and adequate fuel inventory to meet up to a five day natural gas interruption.

Name: _____

Title: _____

Signature: _____

Date: _____





July 15, 2020

**Attachment 4: NYSEG Replenishment of Oil Storage Inventories
Response to Data Request 32**

Company Letterhead

[DATE]

[CUSTOMER NAME]
[CUSTOMER ADDRESS]

Re: Replenishment of Oil Storage Inventories

Dear [CUSTOMER NAME]:

NYSEG is required to send a letter to our interruptible gas service customers to alert them of the potential need to replenish oil storage inventories whenever accumulated gas service interruptions exceed a total of five (5) days prior to February 15. Our records indicate that you have been interrupted [x] days this heating season. Please review your supply and ensure it is sufficient for the remaining heating season.

Should you have any questions, please contact me at [PHONE NUMBER].

Sincerely,

Account Manager





NYSEG



RG&E

July 15, 2020

**Attachment 5: Non-Interruptible Customers with Alternate Fuel Capabilities
Response to Data Request 31**

New York State Electric and Gas	
Customer Name	Design Day MDQ in Dths
Customer 1	224.67
Customer 2	226.61
Customer 3	414.49
Customer 4	1,186.90
Customer 5	546.13
Customer 6	73.60
Customer 7	247.17
Customer 8	65.16
Customer 9	870.30
Customer 10	363.91
Customer 11	268.35
Customer 12	10.71
Customer 13	110.49
Customer 14	74.46
Customer 15	75.45
Customer 16	3,283.00
Customer 17	354.22
Customer 18	37.85
Customer 19	59.04
Customer 20	831.64
Customer 21	103.65
Customer 22	350.34
Customer 23	433.07
Customer 24	47.06
Customer 25	210.28
Customer 26	1,587.19
Customer 27	285.64
Customer 28	178.13
Customer 29	1,617.43
Customer 30	65.01
Customer 31	94.70
Customer 32	113.20
Customer 33	39.66
Customer 34	41.81
Customer 35	199.45
Customer 36	50.09
Customer 37	439.10
Customer 38	1,331.89
Customer 39	6,055.34
Customer 40	48.43
Customer 41	482.38
Customer 42	3,405.32
Customer 43	1,280.67
Customer 44	133.49
Customer 45	47.34
Customer 46	103.81





NYSEG



RG&E

July 15, 2020

New York State Electric and Gas	
Customer Name	Design Day MDQ in Dths
Customer 47	58.06
Customer 48	95.47
Customer 49	111.60
Customer 50	87.36
Customer 51	50.10
Customer 52	136.16
Customer 53	201.55
Customer 54	158.65
Customer 55	61.86
Customer 56	54.27
Customer 57	219.89
Customer 58	78.91
Customer 59	47.94
Customer 60	336.57
Customer 61	197.34
Customer 62	480.07
Customer 63	444.70
Customer 64	354.60
Customer 65	217.24
Customer 66	20.78
Customer 67	119.25
Customer 68	2,121.76
Customer 69	107.08
Customer 70	76.10
Customer 71	38.90
Customer 72	97.64
Customer 73	19.07
Customer 74	438.19
Customer 75	49.24
Customer 76	103.92
Customer 77	47.88
Customer 78	777.68
Customer 79	40.45
Customer 80	155.11
Customer 81	92.92
Customer 82	322.76
Customer 83	1,046.53
Customer 84	11.42
Customer 85	386.99
Customer 86	1,081.14
Customer 87	704.37
Customer 88	73.05
Customer 89	50.56
Customer 90	62.47
Customer 91	498.69
Customer 92	242.72
Customer 93	174.29
Customer 94	77.68
Customer 95	55.82
Customer 96	111.66
Total Dths	40,667.10



**NYSEG****RG&E**

July 15, 2020

Rochester Gas & Electric	
Customer Name	Design Day MDQ in Dths
Customer 1	48.35
Customer 2	426.46
Customer 3	1,392.75
Customer 4	528.75
Customer 5	497.20
Customer 6	1,219.44
Customer 7	653.48
Customer 8	874.64
Customer 9	516.41
Customer 10	4,269.25
Customer 11	1,239.25
Customer 12	1,448.97
Customer 13	301.69
Customer 14	1,905.76
Customer 15	11,724.21
Total Dths	27,046.61



**Attachment 6: NYSEG Franchise Opportunities
Response to Data Request 28f**

OpCo	Division	Municipalities	Franchise Type
NYSEG	Plattsburgh	Town of Schuyler Falls	New
NYSEG	Plattsburgh	Town of Chazy	Expansion of Existing Limited Franchise
NYSEG	Geneva	Town of Romulus	Expansion of Existing Limited Franchise
NYSEG	Geneva	Town of Ovid	New
NYSEG	Geneva	Village of Ovid	New
NYSEG	Elmira	Village of Odessa	New



Attachment 7: Electric Generators in NYSEG and RG&E Service Territory
Response to Data Request 40i

NamePlate				NamePlate			
OPCO	Rating (kW)	FuelType	Interconnection	OPCO	Rating (kW)	FuelType	Interconnection
NYSEG	10	Gas	DISTRIBUTION	NYSEG	1,520	Gas	DISTRIBUTION
NYSEG	50	Gas	DISTRIBUTION	NYSEG	7,400	Gas	DISTRIBUTION
NYSEG	60	Gas	DISTRIBUTION	NYSEG	30,000	Gas	TRANSMISSION
NYSEG	75	Gas	DISTRIBUTION	NYSEG	48,000	Gas	TRANSMISSION
NYSEG	90	Gas	DISTRIBUTION	NYSEG	56,600	Gas	TRANSMISSION
NYSEG	100	Gas	DISTRIBUTION	NYSEG	67,000	Gas	TRANSMISSION
NYSEG	105	Gas	DISTRIBUTION	NYSEG	176,500	Gas	TRANSMISSION
NYSEG	126	Gas	DISTRIBUTION	NYSEG	240,000	Gas	TRANSMISSION
NYSEG	180	Gas	DISTRIBUTION	RG&E	75	Gas	DISTRIBUTION
NYSEG	180	Gas	DISTRIBUTION	RG&E	75	Gas	DISTRIBUTION
NYSEG	220	Gas	DISTRIBUTION	RG&E	90	Gas	DISTRIBUTION
NYSEG	225	Gas	DISTRIBUTION	RG&E	100	Gas	DISTRIBUTION
NYSEG	225	Gas	DISTRIBUTION	RG&E	150	Gas	DISTRIBUTION
NYSEG	230	Gas	DISTRIBUTION	RG&E	150	Gas	DISTRIBUTION
NYSEG	300	Gas	DISTRIBUTION	RG&E	150	Gas	DISTRIBUTION
NYSEG	300	Gas	DISTRIBUTION	RG&E	168	Gas	DISTRIBUTION
NYSEG	300	Gas	DISTRIBUTION	RG&E	225	Gas	DISTRIBUTION
NYSEG	375	Gas	DISTRIBUTION	RG&E	225	Gas	DISTRIBUTION
NYSEG	375	Gas	DISTRIBUTION	RG&E	260	Gas	DISTRIBUTION
NYSEG	380	Gas	DISTRIBUTION	RG&E	450	Gas	DISTRIBUTION
NYSEG	390	Gas	DISTRIBUTION	RG&E	480	Gas	DISTRIBUTION
NYSEG	400	Gas	DISTRIBUTION	RG&E	525	Gas	DISTRIBUTION
NYSEG	492	Gas	DISTRIBUTION	RG&E	750	Gas	DISTRIBUTION
NYSEG	500	Gas	DISTRIBUTION	RG&E	820	Gas	DISTRIBUTION
NYSEG	500	Gas	DISTRIBUTION	RG&E	1,000	Gas	DISTRIBUTION
NYSEG	560	Gas	DISTRIBUTION	RG&E	1,500	Gas	DISTRIBUTION
NYSEG	600	Gas	DISTRIBUTION	RG&E	1,600	Gas	DISTRIBUTION
NYSEG	600	Gas	DISTRIBUTION	RG&E	5,400	Gas	DISTRIBUTION
NYSEG	950	Gas	DISTRIBUTION	RG&E	5,600	Gas	DISTRIBUTION
NYSEG	995	Gas	DISTRIBUTION	RG&E	18,000	Gas	TRANSMISSION
NYSEG	1,150	Gas	DISTRIBUTION				

